

EXHIBIT 16

JUN 13 2008 13:08 FROM:

10:00 719 8100

P.171

S. C. Continent Corporation10316 Norwalk Blvd., Santa Fe Springs, CA 90670
Tel (562) 941-7879 Fax (562) 946-9015

FAX NO
DATE 6/12/2008
TO Asst. General Manager Jong-gi Chun
FROM Sr. Manager Woon-bae Yeo
SUBJECT Work communication

CLERK	A-MGR	MGR	EXEC	BRES

1. Our company is submitting order as below, so please ship them.
P.O. No. 08-054 (Hosan Trading ORDER)

✓ P.O. No. 08-055 (Ship in 3 weeks) DESTN: S.C
Samyang Ramen 3250CT Changgu 200 CT Sattobap 200CT
Total 3650CT 40HQ x 1VAN CBM86.00

✓ P.O. No. 08-056 (Ship in 4 weeks) DESTN: S.C
Samyang Ramen(multi) 1050CT Chacharoni(multi) 500 CT Sutamyun(multi) 600CT
Total 2150CT 40HQ x 1VAN CBM67.32

P.O. No. 08-057 (Ship in 4 weeks) DESTN: S.C
Samyang Ramen 1000CT Unfried Ramen(multi) 500 CT Yeolmu Bibimmyun(multi) 200CT Miso
Ramen(multi) 200CT Changgu 200CT Sattobap 200CT Wang Changgu 100CT
Total 2400CT 40HQ x 1VAN CBM67.54

P.O. No. 08-058 (Ship in 5 weeks) DESTN: S.C
Potato Ramen(multi) 200CT Beef Ramen(multi) 200 CT Pojangmacha Udon(multi) 200CT
Yibaekyang(multi) 200CT Suta Big Cup 200CT Samyang Cup Ramen(6) 2000CT Suta Cup Ramen(6)
1350CT Changgu 200CT Sattobap 150CT
Total 4700CT 40HQ x 1VAN CBM87.74

2. Regarding import of product for domestic consumption.

Recently, there have been large volumes of products for domestic consumption being imported into the eastern region of U.S., so there has been severe COMPLAINS from our customers (RHEE BROS, SEOUL SHIK POOM, HANMI WASHINGTON) and we're having a lot of difficulty selling ramen. If domestic-use products continue to be imported indiscriminately, we will be in a very difficult situation since we won't be able to guarantee the business with our company's existing customers in the eastern region. Aside from products that our company is currently importing and selling in the U.S., large volumes of new products (Jangsu Ramen, Tasty Ramen, etc.) are being imported and sold, so there are especially strong complaints from existing customers.

We've already informed you via phone about this, but nothing has been done about it even now.

We understand that it may be difficult, but we ask that your company's overseas sales team to send a strong, official cooperation notice to each sales department (agency, discount stores, distribution headquarters, etc.) to remedy this situation. We ask for your cooperation on this matter, and please notify the results to our company.

SAMYANG0022586T

Confidential

JUN-13-2008 15:58 From:

To: 02 919 6180

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S. C. Continent Corporation10316 Norwalk Blvd., Santa Fe Springs, CA 90670
Tel: (562) 941-7879 Fax: (562) 946-8015

FAX NO

DATE 6/12/2008

TO 진중기차장

FROM 여운배부장

SUBJECT 법인

CLERK	A-MGR	MGR	EXEC	BRES

1. 당사에서 아래와 같이 ORDER 하오니 선적바랍니다.
P.O. NO. 08-054(호신통신 ORDER)

P.O. NO. 08-055(3주후선적)

DESTN: S.C

✓ 삼양라면 3250CT 향구200CT 사또면200CT

계3650CT

40HQ X 1VAN

CBW86.50

✓ P.O. NO. 08-056(4주후선적)

DESTN: S.C

삼양라면(일티)1050CT 불짜오면(일티)500CT 수타면(일티)800CT

계2150CT

40HQ X 1VAN

CBW87.32

P.O. NO. 08-057(4주후선적)

DESTN: S.C

삼양라면1000CT 만취라면(일티)600CT 임무비빔면(일티)200CT 동창라면(일티)200CT 향구200CT 사또면200CT 완향구100CT

계2400CT

40HQ X 1VAN

CBW87.54

P.O. NO. 08-058(5주후선적)

DESTN: S.C

김치라면(일티)200CT 쇠고기면(일티)200CT 포장마자우면(일티)200CT 이백남(일티)200CT 수타면200CT
삼양라면(6)2000CT 수타면라면(6)1350CT 향구200CT 사또면150CT

계4700CT

40HQ X 1VAN

CBW87.74

2. 내수용제품 수입 관련 사항입니다.

최근들어 마 동부지역에 내수용제품이 대량 수입되고 있어, 당 거래처(RHEE BROS., SEOUL SHIK POON, HANMI WASHINGTON) COMPLAIN 이 무척 심해, 당사 라면 판매에 큰 어려움이 있습니다.
이런 상태로 내수용 제품이 부차적 수입이 계속될 경우, 현재 동부지역 기존 당사 거래처와의 거래도 장담할 수 없는 상황으로 상왕하 어려운 입장입니다.
당사에서 현재 마 동부지역에 수입 판매하고 있는 제품외에 신제품(장수면, 맛있는라면 등)이 대량으로 수입 판매되고 있어 기존 거래처 판매는 더욱더 심합니다.
이런 내용을 동선상 통보하였으나, 현재까지 전혀 시정되고 있지 않은 실정입니다.
아쉬우시겠지만
귀사 해외영업부에서 각 영업부(대리점, 할인점, 유통점 등)에 강력한 입소 공문을 보내서 시정될 수 있도록 부탁드립니다.
협조해주시기바라며, 결과금 당사로 통보하여 주시기 바랍니다.

EXHIBIT 17

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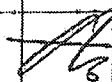


AUG-22-2008 15:37 From:

To: 919 6100

P.1/2

S. C. Continent Corporation10816 Norwalk Blvd., Santa Fe Springs, CA 90670
Tel. (562) 941-7879 Fax (562) 940-9815

FAX NO
DATE 8/22/2008
TO Sr. Manager Jong-gi Chun
FROM Sr. Manager Woon-bae Yeo
SUBJECT Work communication

CLERK	A-MGR	MGR	EXEC	PRES
				

1. Our company is submitting order as below, so please ship them.

P.O. No. 08-078 (Ship in 3 weeks) DESTN: S.C
Kalguksu (Bajirak) 500CT Pojangmacha Udon 500CT Kimchi Ramen(20) 500CT Beef Ramen 450CT
Chacharoni 500CT Sutamyun 500CT Changgu 300CT Sattobap 100CT Wang Changgu 100CT
Total 3450CT 40HQ x 1VAN CBM67.70

P.O. No. 08-079 (Ship in 3 weeks) DESTN: S.C
Samyang Ramen(multi) 1050CT Seafood Party(multi) 200CT Miso Ramen(multi) 200CT Changgu
300CT Sattobap 100CT Wang Changgu 100CT
Total 1950CT 40HQ x 1VAN CBM67.86

P.O. No. 08-080 (Ship in 4 weeks) DESTN: S.C
Samyang Ramen(multi) 1000CT Kalguksu(multi) 500CT Miso Ramen 500CT Changgu 330CT
Total 2330CT 40HQ x 1VAN CBM67.47

P.O. No. 08-081 (Ship in 4 weeks) DESTN: S.C
Samyang Ramen 2950CT Changgu 300CT Sattobap 100CT Wang Changgu 100CT
Total 3450CT 40HQ x 1VAN CBM67.70

****** P.O. No. 08-082 (Ship in 3 weeks) DESTN: S.C
Samyang Ramen 1600CT Samyang Ramen(multi) 800CT Sutamyun(multi) 200CT Chacharoni(multi)
150CT Samyang Cup Ramen(6) 1000CT
Total 3750CT 40HQ x 1VAN CBM67.82

****** P.O. No. 08-083 (Ship in 3 weeks after shipment of P.O. No. 08-82) DESTN: S.C
Samyang Ramen 1500CT Samyang Ramen(multi) 400CT Sutamyun(multi) 150CT Chacharoni(multi)
200CT Samyang Cup Ramen(6) 2600CT
Total 4850CT 40HQ x 1VAN CBM67.58
5,050

* Above ORDER with P.O. No. 08-082, 083 are ORDERs by HK GALLERIA WHOLESALE (HK Market).

2. Please see below for the ORDER for "CJ FOOD". Please ship. FOB

P.O. No. 08-084 (Ship in 4 weeks) DESTN: LA
Samyang Ramen 2000CT Chacharoni 200CT Sutamyun 600CT Kimchi Ramen(20) 75CT Seafood Party
75CT Miso Ramen 50CT Samyang Ramen(multi) 100CT Chacharoni(multi) 50CT Unfried Ramen(multi)
50CT Miso Ramen(multi)80CT Seafood Party(multi) 50CT Samyang Cup Ramen(6) 500CT Suta Cup
Ramen(6) 200CT Changgu 80CT Sattobap 50CT
Total 4180CT 40HQ x 1VAN CBM67.88

SAMYANG0022607T

Confidential

To: 919 6188

22-2008 15:37 From:

✓ Please see below for the ORDER for "SEOUL TRADING". Please ship. FOB

P.O. No. 08-085 (Ship in 4 weeks)

DESTN: TACOMA

Samyang Ramen 450CT Yibaekyang 20CT Kalguksu (Bajirak) 30CT Pojangmacha Udon 30CT
Sutamyun 40CT Chacharoni 30CT Seafood Party 40CT Samyang Ramen(multi) 400CT Kimchi
Ramen(multi) 50CT Yibaekyang(multi) 30CT Bajirak Kalguksu(multi) 100CT Pojangmacha Udon(multi)
40CT Sutamyun(multi) 300CT Chacharoni(multi) 60CT Beef(multi) 30CT Seafood Party(multi) 40CT
Unfried Ramen(multi) 100CT Miso Ramen(multi) 60CT Pojangmacha(//illegible//) 30T Samyang Cup
Ramen(6) 300CT Suta Cup Ramen(6) 300CT Samyang Big Cup 20CT Suta Seafood 20CT Changgu
100CT Sattobap 30CT Wang Changgu 180CT

Total 2830CT 40HQ x 1VAN CBM67.59

✓ Please see below for the ORDER for "KOHA FOOD". Please ship.

P.O. No. 08-086

DESTN: HONOLULU

Samyang Ramen 800CT Kimchi Ramen(20) 1850CT Chacharoni 700CT Beef Ramen 300CT
Pojangmacha Udon 50CT Yibaekyang 100CT Sutamyun 500CT Seafood Party 50CT Miso Ramen 30CT
Unfried Ramen(multi) 20CT Pojangmacha(//illegible//) 300CT Kimchi Ramen(12) 250CT

Total 4300CT 40HQ x 1VAN CBM87.18

5. Please see below for the ORDER for "PALAMA SUPER". Please ship.

P.O. No. 08-087

DESTN: HONOLULU

Samyang Ramen 800CT Chacharoni 150CT Sutamyun 50CT Yibaekyang 50CT Kimchi Ramen(20)
1000CT Kalguksu(Bajirak) 200CT Pojangmacha Udon 200CT Beef Ramen 100CT Seafood Party
100CT Unfried Ramen(multi) 100CT Seafood Party(multi) 50CT Kimchi Ramen(multi) 100CT
Pojangmacha Udon(multi) 50CT Chacharoni(multi) 220CT Samyang Ramen(multi) 100CT Samyang
Cup Ramen(6) 100CT Suta Cup Ramen(6) 50CT Changgu 50CT Sattobap 50CT Wang Changgu 50CT

Total 3570CT 40HQ x 1VAN CBM67.88

6. Regarding "RHEE BROS".

1) As previously mentioned over the phone, among products received from P.O. No. 08-041, the BOX for Pojangmacha(multi) 200CT and Yibaekyang(multi) 100CT (Total 300CT) is marked with the same CODE NO. as the existing Yibaekyang and Pojangmacha Udon, and therefore have been notified that it cannot be sold. Please remedy with STIKER [sic] as below.

2) Remedy: P.O No. 08-041: Produce STICKER for 300CT of received products and send to our company. ✓

P.O No. 08-064: Please ship after marking the BOX with No. below.

3) Yibaekyang(multi): 08045K Pojangmacha Udon(multi): 08059K

4) Please refer to CODE No. for the products below.

Samyang Ramen(multi) 08050K Sutamyun(multi) 08051K Unfried Ramen(multi) 08042K
Miso Ramen(multi) 08031K Seafood Party(multi) 08048K Beef Ramen(multi) 08058K Bajirak
Kalguksu(multi) 08071K Yibaekyang(multi) 08045K Pojangmacha Udon(multi) 08059K

7. Regarding lack of CONTR shipment quantity.

P.O. No. 08-57: Changgu 35CT short (165CT received)

There is a big discrepancy in quantity. Please check for future shipments.

SAMYANG0022608.01T

8. Regarding sending SAMPLE.

For your reference, we are sending via DHL the SAMPLE of the domestic-use products for Korea that have been imported to the eastern regions of the U.S. (New York, Washington). (New York region: DY IMPORT Washington region: CONTR being imported by Seohae Fishery.)

SAMYANG0022608.02T

Confidential
#2234

AUG-22-2008 15:37 From:

To: 919 6180

P.1/2

EXHIBIT

tabbies

1051D

S. C. Continent Corporation10116 Norwalk Blvd., Santa Fe Springs, CA 90670
Tel. (562) 941-7879 Fax (562) 940-9915

FAX NO

DATE 8/22/2008

TO 신광기부정

FROM 여운배부정

SUBJECT 일원

CLERK	A-MGR	MGR	EXEC	PRES

1. 당사에서 아래와같이 ORDER 하오니 선택바랍니다.

P.O.NO.08-078(3주후선적) DESTN:S.C

발곡수(바지막)500CT 포장마차우동500CT 김치라면(20)500CT 쇠고기면450CT 파파로니500CT 수타면500CT 향구300CT
사또밥100CT 왕참구100CT

계3450CT 40HQ X IVAN CBW67.70

P.O.NO.08-079(3주후선적)

DESTN:S.C

삼양라면(멸티)1050CT 해운파티(멸티)200CT 된장라면(멸티)200CT 향구300CT 사또밥100CT 왕참구100CT
계1950CT 40HQ X IVAN CBW67.88

P.O.NO.08-080(4주후선적)

DESTN:S.C

삼양라면(멸티)1000CT 발곡수(멸티)500CT 된장라면500CT 향구300CT
계2330CT 40HQ X IVAN CBW67.47

P.O.NO.08-081(4주후선적)

DESTN:S.C

삼양라면2950CT 향구300CT 사또밥100CT 왕참구100CT
계3450CT 40HQ X IVAN CBW67.70

HK P.O.NO.08-082(3주후선적)

DESTN:S.C

삼양라면1600CT 삼양라면(멸티)600CT 수타면(멸티)200CT 파파로니(멸티)150CT 삼양라면(8)1000CT
계3750CT 40HQ X IVAN CBW67.82

HK P.O.NO.08-083(P.O.NO.08-82선적후 3주간지)

DESTN:S.C

삼양라면1500CT 삼양라면(멸티)400CT 수타면(멸티)150CT 파파로니(멸티)200CT 삼양라면(8)2800CT
계4880CT 40HQ X IVAN CBW67.58

* 상기 P.O.NO.08-082,083,084,085,086,087,088,089,090,091,092,093,094,095,096,097,098,099,100,101,102,103,104,105,106,107,108,109,110,111,112,113,114,115,116,117,118,119,120,121,122,123,124,125,126,127,128,129,130,131,132,133,134,135,136,137,138,139,140,141,142,143,144,145,146,147,148,149,150,151,152,153,154,155,156,157,158,159,160,161,162,163,164,165,166,167,168,169,170,171,172,173,174,175,176,177,178,179,180,181,182,183,184,185,186,187,188,189,190,191,192,193,194,195,196,197,198,199,200,201,202,203,204,205,206,207,208,209,210,211,212,213,214,215,216,217,218,219,220,221,222,223,224,225,226,227,228,229,230,231,232,233,234,235,236,237,238,239,240,241,242,243,244,245,246,247,248,249,250,251,252,253,254,255,256,257,258,259,260,261,262,263,264,265,266,267,268,269,270,271,272,273,274,275,276,277,278,279,280,281,282,283,284,285,286,287,288,289,290,291,292,293,294,295,296,297,298,299,300,301,302,303,304,305,306,307,308,309,310,311,312,313,314,315,316,317,318,319,320,321,322,323,324,325,326,327,328,329,330,331,332,333,334,335,336,337,338,339,340,341,342,343,344,345,346,347,348,349,350,351,352,353,354,355,356,357,358,359,360,361,362,363,364,365,366,367,368,369,370,371,372,373,374,375,376,377,378,379,380,381,382,383,384,385,386,387,388,389,390,391,392,393,394,395,396,397,398,399,400,401,402,403,404,405,406,407,408,409,410,411,412,413,414,415,416,417,418,419,420,421,422,423,424,425,426,427,428,429,430,431,432,433,434,435,436,437,438,439,440,441,442,443,444,445,446,447,448,449,450,451,452,453,454,455,456,457,458,459,460,461,462,463,464,465,466,467,468,469,470,471,472,473,474,475,476,477,478,479,480,481,482,483,484,485,486,487,488,489,490,491,492,493,494,495,496,497,498,499,500,501,502,503,504,505,506,507,508,509,510,511,512,513,514,515,516,517,518,519,520,521,522,523,524,525,526,527,528,529,530,531,532,533,534,535,536,537,538,539,540,541,542,543,544,545,546,547,548,549,550,551,552,553,554,555,556,557,558,559,560,561,562,563,564,565,566,567,568,569,570,571,572,573,574,575,576,577,578,579,580,581,582,583,584,585,586,587,588,589,590,591,592,593,594,595,596,597,598,599,600,601,602,603,604,605,606,607,608,609,610,611,612,613,614,615,616,617,618,619,620,621,622,623,624,625,626,627,628,629,630,631,632,633,634,635,636,637,638,639,640,641,642,643,644,645,646,647,648,649,650,651,652,653,654,655,656,657,658,659,660,661,662,663,664,665,666,667,668,669,670,671,672,673,674,675,676,677,678,679,680,681,682,683,684,685,686,687,688,689,690,691,692,693,694,695,696,697,698,699,700,701,702,703,704,705,706,707,708,709,710,711,712,713,714,715,716,717,718,719,720,721,722,723,724,725,726,727,728,729,730,731,732,733,734,735,736,737,738,739,740,741,742,743,744,745,746,747,748,749,750,751,752,753,754,755,756,757,758,759,760,761,762,763,764,765,766,767,768,769,770,771,772,773,774,775,776,777,778,779,780,781,782,783,784,785,786,787,788,789,790,791,792,793,794,795,796,797,798,799,800,801,802,803,804,805,806,807,808,809,810,811,812,813,814,815,816,817,818,819,820,821,822,823,824,825,826,827,828,829,830,831,832,833,834,835,836,837,838,839,840,841,842,843,844,845,846,847,848,849,850,851,852,853,854,855,856,857,858,859,860,861,862,863,864,865,866,867,868,869,870,871,872,873,874,875,876,877,878,879,880,881,882,883,884,885,886,887,888,889,890,891,892,893,894,895,896,897,898,899,900,901,902,903,904,905,906,907,908,909,910,911,912,913,914,915,916,917,918,919,920,921,922,923,924,925,926,927,928,929,930,931,932,933,934,935,936,937,938,939,940,941,942,943,944,945,946,947,948,949,950,951,952,953,954,955,956,957,958,959,960,961,962,963,964,965,966,967,968,969,970,971,972,973,974,975,976,977,978,979,980,981,982,983,984,985,986,987,988,989,990,991,992,993,994,995,996,997,998,999,1000,1001,1002,1003,1004,1005,1006,1007,1008,1009,1010,1011,1012,1013,1014,1015,1016,1017,1018,1019,1020,1021,1022,1023,1024,1025,1026,1027,1028,1029,1030,1031,1032,1033,1034,1035,1036,1037,1038,1039,1040,1041,1042,1043,1044,1045,1046,1047,1048,1049,1050,1051,1052,1053,1054,1055,1056,1057,1058,1059,1060,1061,1062,1063,1064,1065,1066,1067,1068,1069,1070,1071,1072,1073,1074,1075,1076,1077,1078,1079,1080,1081,1082,1083,1084,1085,1086,1087,1088,1089,1090,1091,1092,1093,1094,1095,1096,1097,1098,1099,1100,1101,1102,1103,1104,1105,1106,1107,1108,1109,1110,1111,1112,1113,1114,1115,1116,1117,1118,1119,1120,1121,1122,1123,1124,1125,1126,1127,1128,1129,1130,1131,1132,1133,1134,1135,1136,1137,1138,1139,1140,1141,1142,1143,1144,1145,1146,1147,1148,1149,1150,1151,1152,1153,1154,1155,1156,1157,1158,1159,1160,1161,1162,1163,1164,1165,1166,1167,1168,1169,1170,1171,1172,1173,1174,1175,1176,1177,1178,1179,1180,1181,1182,1183,1184,1185,1186,1187,1188,1189,1190,1191,1192,1193,1194,1195,1196,1197,1198,1199,1200,1201,1202,1203,1204,1205,1206,1207,1208,1209,1210,1211,1212,1213,1214,1215,1216,1217,1218,1219,1220,1221,1222,1223,1224,1225,1226,1227,1228,1229,1230,1231,1232,1233,1234,1235,1236,1237,1238,1239,1240,1241,1242,1243,1244,1245,1246,1247,1248,1249,1250,1251,1252,1253,1254,1255,1256,1257,1258,1259,1260,1261,1262,126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3,2264,2265,2266,2267,2268,2269,2270,2271,2272,2273,2274,2275,2276,2277,2278,2279,2280,2281,2282,2283,2284,2285,2286,2287,2288,2289,2290,2291,2292,2293,2294,2295,2296,2297,2298,2299,2300,2301,2302,2303,2304,2305,2306,2307,2308,2309,2310,2311,2312,2313,2314,2315,2316,2317,2318,2319,2320,2321,2322,2323,2324,2325,2326,2327,2328,2329,2330,2331,2332,2333,2334,2335,2336,2337,2338,2339,2340,2341,2342,2343,2344,2345,2346,2347,2348,2349,2350,2351,2352,2353,2354,2355,2356,2357,23

Confidential
#2235

To: 919 6180

22-2008 15:37 From:

4. 아래와 같이 "KOHAE 5000" ORDER를 송부하오니 선적바랍니다.
 DESTN: HONOLULU
 P.O. NO. 08-088
 삼양라면800CT 김치라면(20)1850CT 파파도니700CT 쇠고기면300CT 포장마차우동50CT 이백남100CT 수타면50CT
 해동파티50CT 면장라면30CT 만취기면(일티)20CT 포장마차(육)300CT 김치라면(12)250CT
 계4300CT 40HQ X 1VAN CBW67.18

5. 아래와 같이 "PALAMA SURFER" ORDER를 송부하오니 선적바랍니다.
 DESTN: HONOLULU
 P.O. NO. 08-087
 삼양라면800CT 파파도니150CT 수타면50CT 이백남50CT 김치라면(20)1000CT 알곡수(바지락)200CT 포장마차우동200CT
 쇠고기면100CT 해동파티100CT 만취기면(일티)100CT 해동파티(일티)50CT 김치라면(일티)100CT 포장마차우동(일티)50CT
 파파도니(일티)220CT 삼양라면(일티)100CT 삼양정라면(8)100CT 수타면(6)50CT 쌀국수50CT 사또밥50CT 왕참굴50CT
 계3570CT 40HQ X 1VAN CBW67.88

6. "HNEE BROS" 관련사항입니다.
 1) 유선상 기 등화한 내용과 같이, P.O. NO. 08-041 에서 입고된 품목중 포장마차(일티)200CT, 이백남(일티)100CT(계 300CT)
 기준 이백남, 포장마차우동, 과 동일한 CODE NO로 BOX에 표기되어 있어 판매가 불가능하다고 명문화하여 운반, 아래와 같이
 STICKER 제작하여 처리 바랍니다.

2) 처리방법: P.O. NO. 08-041: 입고제품 300CT에 대해 STICKER 제작 일사로 송부. ✓
 P.O. NO. 08-064: 아래 NO로 BOX 표기하여 선적바랍니다.

3) 이백남(일티): 08045K 포장마차우동(일티): 08059K

4) 아래 품목에 대해 CODE NO. 참고바랍니다.
 삼양라면(일티) 08050K 수타면(일티) 08051K 만취기면(일티) 08042K 면장라면(일티) 08031K
 해동파티(일티) 08049K 쇠고기면(일티) 08058K 바지락알곡수(일티) 08071K 이백남(일티) 08045K
 포장마차우동(일티) 08059K

7. CONTR 입고수량 부족 관련사항입니다.

P.O. NO. 08-57: 쌀국수50CT 부족(185CT 입고)
 수량이 많이 들어오니 확인하시고 차기 CONTR에 선적바랍니다.

8. SAMPLE 송부관련 사항입니다.
 이 양도지역(뉴욕, 워싱턴)에 수입되고 있는 한국 내수용제품 SAMPLE를 DHL로 송부드리니 참고하시기 바랍니다.
 (뉴욕지역: D Y IMPORT 워싱턴지역: 서해수산에서 CONTR로 수입되고 있습니다.)

EXHIBIT 18

SY000052

CONTACT INFO

Type	Name	Address
CONSIGNEE	ENI DIST, INC.	7194 OAKLAND MILLS RD, UNIT8 COLUMBIA, MD21046 COL
NOTIFY PARTY	ENI DIST, INC.	7194 OAKLAND MILLS RD, UNIT8 COLUMBIA, MD21046 COL
SHIPPER	JIN HEUNG FOOD CO.,LTD	205HO 5DONG, 555-9 HOGYE-DONG DONGAN-GU, ANYANG

PRODUCT DETAILS

Container No.	Description Area
GESU6215628	INSTANT NOODLES W/SOUP BASE

TRANSIT DETAILS

Property Value

CARRIER BNXC - BINEX LINE CORPORATION

ADDRESS

200 N SEPULVEDA BLVD #1610

EL SEGUNDO

CA, 90245

CONTACT NO.: 3104168600

SHIP REGISTERED IN PANAMA

VESSEL NYK DENEH

VOYAGE 043E

US PORT NEW YORK, NEW YORK

FOREIGN PORT PUSAN

COUNTRY OF ORIGIN SOUTH KOREA

PLACE OF RECEIPT BUSAN, KOREA

BILL OF LADING BNXCWSANYK140770

ARRIVAL DATE 2015-01-24

QUANTITY 2000 CTN

CONTAINER COUNT 1

SY000053

CONTACT INFO

Type	Name	Address
CONSIGNEE	ENI DIST, INC.	7194 OAKLAND MILLS RD, UNIT8 COLUMBIA MD 21046 UNIT
NOTIFY PARTY	CARGO GATE INTERNATIONAL INC	20775 S.WESTERN AVE #101 TORRANCE CA 90501 UNITED
SHIPPER	JIN HEUNG FOOD CO., LTD.	205HO, 5DONG, 555-9, HOGYE-DONG, DO ANYANG 41 683-

PRODUCT DETAILS

Container No.	Description Area
MSCU9431284	OF INSTANT NOODLES W/SOUP BASE & KOREAN SNACK = INVOICE NO.: SY14025 FREIGHT COLLECT

TRANSIT DETAILS

Property Value

CARRIER MSCU - MSC-MEDITERRANEAN SHIPPING COMPANY S A

ADDRESS

40 AVENUE EUGENE PITTARD

GENEVA

, CH 1206

SWITZERLAND

CONTACT NO.: 4122703878

SHIP REGISTERED IN GERMANY

VESSEL MSC CHICAGO

VOYAGE 501A

US PORT BALTIMORE, MARYLAND

FOREIGN PORT NINGPO

COUNTRY OF ORIGIN CHINA

PLACE OF RECEIPT BUSAN

BILL OF LADING MSCUKC207764

ARRIVAL DATE 2015-02-13

QUANTITY 3200 CTN

CONTAINER COUNT 1

SY000054

CONTACT INFO		
Type	Name	Address
CONSIGNEE	ENI DIST, INC.	7194 OAKLAND MILLS RD, UNIT8 COLUMBIA MD 21046 UNITED
NOTIFY PARTY	CARGO GATE INTERNATIONAL INC	20775 S.WESTERN AVE #101 TORRANCE CA 90501 UNITED
SHIPPER	JIN HEJING FOOD CO., LTD.	205HO, 5DONG, 555-9, HOGYE-DONG, DO ANYANG 41 683-

PRODUCT DETAILS	
Container No.	Description Area
GLDU7034575	OF INSTANT NOODLES W/SOUP BASE & KOREAN SNACK = INVOICE NO.: SY14029 FREIGHT COLLECT

TRANSIT DETAILS	
Property	Value
CARRIER	MSCU - MSC-MEDITERRANEAN SHIPPING COMPANY S A
ADDRESS	40 AVENUE EUGENE PITTARD GENEVA , CH 1206 SWITZERLAND
CONTACT NO.:	4122703878
SHIP REGISTERED IN	GERMANY
VESSEL	MSC CHICAGO
VOYAGE	501A
US PORT	BALTIMORE, MARYLAND
FOREIGN PORT	NINGPO
COUNTRY OF ORIGIN	CHINA
PLACE OF RECEIPT	BUSAN
BILL OF LADING	MSCUKC207772
ARRIVAL DATE	2016-02-13
QUANTITY	2050 CTN
CONTAINER COUNT	1

SY000055

CONTACT INFO		
Type	Name	Address
CONSIGNEE	ENI DIST, INC.	7194 OAKLAND MILLS RD, UNIT8 COLUMBIA, MD21046 COL
NOTIFY PARTY	ENI DIST, INC.	7194 OAKLAND MILLS RD, UNIT8 COLUMBIA, MD21046 COL
SHIPPER	JIN HEUNG FOOD CO,LTD	205HO 5DONG, 555-9 HOGYE-DONG DONGAN-GU, ANYANG

PRODUCT DETAILS	
Container No.	Description Area
CBHU8563002	INSTANT NOODLE W/SOUP BASE

TRANSIT DETAILS	
Property	Value
CARRIER	BNXC - BINEX LINE CORPORATION
ADDRESS	200 N SEPULVEDA BLVD #1610 EL SEGUNDO CA, 90245
CONTACT NO.:	3104168600
SHIP REGISTERED IN	MARSHALL ISLANDS
VESSEL	HANJIN NEWPORT
VOYAGE	0039E
US PORT	NEW YORK, NEW YORK
FOREIGN PORT	PUSAN
COUNTRY OF ORIGIN	SOUTH KOREA
PLACE OF RECEIPT	BUSAN, KOREA
BILL OF LADING	BNXCWCANYK150103
ARRIVAL DATE	2015-02-21
QUANTITY	6670 CTN
CONTAINER COUNT	1

SY000056

CONTACT INFO

Type	Name	Address
CONSIGNEE	ENI DIST, INC.	7194 OAKLAND MILLS RD, UNIT8 COLUMBIA, MD21046 COL
NOTIFY PARTY	ENI DIST, INC.	7194 OAKLAND MILLS RD, UNIT8 COLUMBIA, MD21046 COL
SHIPPER	JIN HEUNG FOOD CO,LTD	205HO 5DONG, 555-9 HOGYE-DONG DONGAN-GU, ANYANG

PRODUCT DETAILS

Container No.	Description Area
FSCU8494212	INSTANT NOODLEW/SOUP BASE

TRANSIT DETAILS

Property	Value
CARRIER	BNXC - BINEX LINE CORPORATION
ADDRESS	200 N SEPULVEDA BLVD #1610 EL SEGUNDO CA, 90245
CONTACT NO.:	3104168600
SHIP REGISTERED IN	MARSHALL ISLANDS
VESSEL	HANJIN MILANO
VOYAGE	0041E
US PORT	NEW YORK, NEW YORK
FOREIGN PORT	PUSAN
COUNTRY OF ORIGIN	SOUTH KOREA
PLACE OF RECEIPT	BUSAN, KOREA
BILL OF LADING	BNXOWCANYK150104
ARRIVAL DATE	2015-02-28
QUANTITY	2030 CTN
CONTAINER COUNT	1

SY000057

CONTACT INFO		
Type	Name	Address
CONSIGNEE	ENI DIST, INC.	7194 OAKLAND MILLS RD, UNIT8 COLUMBIA, MD21046 COL
NOTIFY PARTY	ENI DIST, INC.	7194 OAKLAND MILLS RD, UNIT8 COLUMBIA, MD21046 COL
SHIPPER	JIN HEUNG FOOD CO,LTD	205HO 5DONG, 555-9 HOGYE-DONG DONGAN-GU, ANYANG

PRODUCT DETAILS	
Container No.	Description Area
CBHU8970923	INSTANT NOODLES W/SOUP BASE

TRANSIT DETAILS	
Property	Value
CARRIER	BNXC - BINEX LINE CORPORATION
ADDRESS	200 N SEPULVEDA BLVD #1610 EL SEGUNDO CA, 90245
CONTACT NO.:	3104168600
SHIP REGISTERED IN	PANAMA
VESSEL	HANJIN RIO DE JANEIRO
VOYAGE	0045E
US PORT	NEW YORK, NEW YORK
FOREIGN PORT	PUSAN
COUNTRY OF ORIGIN	SOUTH KOREA
PLACE OF RECEIPT	BUSAN, KOREA
BILL OF LADING	BNXCWCANYK150213
ARRIVAL DATE	2015-03-16
QUANTITY	3000 CTN
CONTAINER COUNT	1

SY000058

CONTACT INFO		
Type	Name	Address
CONSIGNEE	ENI DIST, INC.	7194 OAKLAND MILLS RD, UNIT8 COLUMBIA, MD21046 COL
NOTIFY PARTY	ENI DIST, INC.	7194 OAKLAND MILLS RD, UNIT8 COLUMBIA, MD21046 COL
SHIPPER	JIN HEUNG FOOD CO,LTD	205HO 5DONG, 555-9 HOGYE-DONG DONGAN-GU, ANYANG

PRODUCT DETAILS	
Container No.	Description Area
DRYU9163001	INSTANT NOODLES W/SOUP BASE KOREAN SNACK

TRANSIT DETAILS	
Property	Value
CARRIER	BNXC - BINEX LINE CORPORATION
ADDRESS	200 N SEPULVEDA BLVD #1610 EL SEGUNDO CA, 90245
CONTACT NO.:	3104168600
SHIP REGISTERED IN	PANAMA
VESSEL	HANJIN RIO DE JANEIRO
VOYAGE	0045E
US PORT	NEW YORK, NEW YORK
FOREIGN PORT	FUSAN
COUNTRY OF ORIGIN	SOUTH KOREA
PLACE OF RECEIPT	BUSAN, KOREA
BILL OF LADING	BNXCWCANYK150212
ARRIVAL DATE	2015-03-16
QUANTITY	3190 CTN
CONTAINER COUNT	1

SY000059

CONTACT INFO

Type	Name	Address
CONSIGNEE	ENI DIST, INC.	7194 OAKLAND MILLS RD, UNIT8 COLUMBIA MD 21046 UNIT
NOTIFY PARTY	CARGO GATE INTERNATIONAL INC	20775 S.WESTERN AVE #101 TORRANCE CA 90501 UNITED
SHIPPER	JIN HEUNG FOOD CO., LTD.	205HO, 5DONG, 555-9, HOGYE-DONG, DO ANYANG 41 683

PRODUCT DETAILS

Container No.	Description Area
MEDU8271784	OF INSTANT NOODLES W/SOUP BASE KOREAN SNACK FREIGHT COLLECT

TRANSIT DETAILS

Property Value

CARRIER MSCU - MSC-MEDITERRANEAN SHIPPING COMPANY S A

ADDRESS

40 AVENUE EUGENE PITTARD

GENEVA

CH 1206

SWITZERLAND

CONTACT NO.: 4122703878

SHIP REGISTERED IN LIBERIA

VESSEL MAERSK SARNIA

VOYAGE 1512

US PORT BALTIMORE, MARYLAND

FOREIGN PORT NINGPO

COUNTRY OF ORIGIN CHINA

PLACE OF RECEIPT BUSAN

BILL OF LADING MSCUKC233539

ARRIVAL DATE 2015-03-20

QUANTITY 2400 CTN

CONTAINER COUNT 1

SY000060

CONTACT INFO		
Type	Name	Address
CONSIGNEE	ENI DIST, INC.	7194 OAKLAND MILLS RD, UNIT8 COLUMBIA, MD21046 COL
NOTIFY PARTY	ENI DIST, INC.	7194 OAKLAND MILLS RD, UNIT8 COLUMBIA, MD21046 COL
SHIPPER	JIN HEUNG FOOD CO,LTD	205HO 5DONG, 555-9 HOGYE-DONG DONGAN-GU, ANYANG

PRODUCT DETAILS	
Container No.	Description Area
CBHU8376510	INSTANT NOODLESKOREAN SNCAK

TRANSIT DETAILS	
Property	Value
CARRIER	BNXC - BINEX LINE CORPORATION
ADDRESS	200 N SEPULVEDA BLVD #1610 EL SEGUNDO CA, 90245
CONTACT NO.:	3104168600
SHIP REGISTERED IN	GERMANY
VESSEL	HANJIN SAN DIEGO
VOYAGE	0030E
US PORT	NEW YORK, NEW YORK
FOREIGN PORT	PUSAN
COUNTRY OF ORIGIN	SOUTH KOREA
PLACE OF RECEIPT	BUSAN, KOREA
BILL OF LADING	BNXCWCANYK150247
ARRIVAL DATE	2015-03-27
QUANTITY	2000 CTN
CONTAINER COUNT	1

SY0000061

CONTACT INFO		
Type	Name	Address
CONSIGNEE	ENI DIST, INC.	7194 OAKLAND MILLS RD, UNIT8 COLUMBIA, MD21046
NOTIFY PARTY	SAME AS CONSIGNEE	NOT AVAILABLE
SHIPPER	JIN HEUNG FOODCO.,LTD.	205HO, 5DONG, 555-9, HOGYE-DONG, DONGAN-GU, ANYA

PRODUCT DETAILS	
Container No.	Description Area
TGHU9850300	X40 HC CONTAINER STC: 2,300 CTNS OF INSTANT NOODLES W-SOUP BASE & KOREA N SNACK INVOICEN FREIGHT COLLECT

TRANSIT DETAILS	
Property	Value
CARRIER	CNIU - COMPANIA CHILENA DE NAVIGACION INTEROCEA
ADDRESS	
	LAS CONDES-SANTIAGO
	CHILE
CONTACT NO.:	
SHIP REGISTERED IN	CHINA
VESSEL	CAPISABEL
VOYAGE	75NB
US PORT	BALTIMORE, MARYLAND
FOREIGN PORT	TONOSI
COUNTRY OF ORIGIN	PANAMA
PLACE OF RECEIPT	BUSAN KOREA
BILL OF LADING	CNIUKR7260003A
ARRIVAL DATE	2015-04-01
QUANTITY	2300 CTN
CONTAINER COUNT	1

SY000062

CONTACT INFO		
Type	Name	Address
CONSIGNEE	ENI DIST, INC.	7194 OAKLAND MILLS RD STE 8., COLUMBIA, MD 21046 TEL CEL 433)807-3520
NOTIFY PARTY	ENIDIST, INC.	7194 OAKLAND MILLS RD, UNIT 8 COLUMBIA, MD 21046
SHIPPER	JIN HEUNG FOOD CO., LTD.	205HO, 5DONG, 555-9, HOGYE-DONG, DONGAN-GU, ANYA

PRODUCT DETAILS	
Container No.	Description Area
GESU4972638	X40 HC CONTAINER S.T.C 2,350 CTNS OF INSTANT NOODLES W-SOUP BASE & KOREA N SNACK FREIGHT

TRANSIT DETAILS	
Property	Value
CARRIER	CNIU - COMPANIA CHILENA DE NAVIGACION INTEROCEA
ADDRESS	
	LAS CONDES-SANTIAGO
	CHILE
CONTACT NO.:	
SHIP REGISTERED IN	LIBERIA
VESSEL	LETO
VOYAGE	1587N
US PORT	BALTIMORE, MARYLAND
FOREIGN PORT	TONOSI
COUNTRY OF ORIGIN	PANAMA
PLACE OF RECEIPT	BUSAN KOREA
BILL OF LADING	CNIUKR7274728A
ARRIVAL DATE	2015-04-16
QUANTITY	2350 CTN
CONTAINER COUNT	1

SY000063

CONTACT INFO		
Type	Name	Address
CONSIGNEE	ENI DIST, INC.	7194 OAKLAND MILLS RD, UNIT8 COLUMBIA, MD21046 COL
NOTIFY PARTY	ENI DIST, INC.	7194 OAKLAND MILLS RD, UNIT8 COLUMBIA, MD21046 COL
SHIPPER	JIN HEUNG FOOD CO,LTD	205HO 5DONG, 555-9 HOGYE-DONG DONGAN-GU, ANYANG

PRODUCT DETAILS	
Container No.	Description Area
FCIU9994933	INSTANT NOODLES W/SOUP BASEKOREAN SNACK

TRANSIT DETAILS	
Property	Value
CARRIER	BNXC - BINEX LINE CORPORATION
ADDRESS	200 N SEPULVEDA BLVD #1610 EL SEGUNDO CA, 90245
CONTACT NO.:	3104168600
SHIP REGISTERED IN	KOREA, REPUBLIC OF
VESSEL	HANJIN MARSELLES
VOYAGE	0168E
US PORT	NEW YORK, NEW YORK
FOREIGN PORT	PUSAN
COUNTRY OF ORIGIN	SOUTH KOREA
PLACE OF RECEIPT	BUSAN, KOREA
BILL OF LADING	BNXCWSANYK150226
ARRIVAL DATE	2015-04-25
QUANTITY	3100 CTN
CONTAINER COUNT	1

SY000064

CONTACT INFO		
Type	Name	Address
CONSIGNEE	ENI DIST, INC.	7194 OAKLAND MILLS RD, UNIT8 COLUMBIA, MD21046 COL
NOTIFY PARTY	ENI DIST, INC.	7194 OAKLAND MILLS RD, UNIT8 COLUMBIA, MD21046 COL
SHIPPER	JIN HEUNG FOOD CO,LTD	205HO 5DONG, 555-9 HOGYE-DONG DONGAN-GU, ANYANG

PRODUCT DETAILS	
Container No.	Description Area
CBHU9528921	INSTANT NOODLES W/SOUP BASE

TRANSIT DETAILS	
Property	Value
CARRIER	BNXC - BINEX LINE CORPORATION
ADDRESS	200 N SEPULVEDA BLVD #1610 EL SEGUNDO CA, 90245
CONTACT NO.:	3104168600
SHIP REGISTERED IN	KOREA, REPUBLIC OF
VESSEL	HANJIN MARSELLES
VOYAGE	0168E
US PORT	NEW YORK, NEW YORK
FOREIGN PORT	PUSAN
COUNTRY OF ORIGIN	SOUTH KOREA
PLACE OF RECEIPT	BUSAN, KOREA
BILL OF LADING	BNXCWSANYK150225
ARRIVAL DATE	2015-04-25
QUANTITY	2000 CTN
CONTAINER COUNT	1

SY000065

EXHIBIT 19

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WEST DIVISION

SAM YANG (USA), Inc.,
ROYPAC, INC., dba SC
CONTINENT CORPORATION,

Plaintiff,

vs.

SAMYANG FOODS CO., LTD,
and DOES 1 through 20,
inclusive,

Defendants.

SAMYANG FOODS CO., LTD

Counter-Claimant,

vs.

SAM YANG (USA), Inc.,
ROYPAC, INC., dba SC
CONTINENT CORPORATION,
MUN-K YUNG CHENm and
DOES 1 through 20,
inclusive,

Counter-Defendants.

VIDEOTAPED DEPOSITION OF WOON-BAE YEO
Los Angeles, California
Friday, September 8, 2017
Volume I

Reported by:
Lori M. Barkley
CSR No. 6426
Job No. 2703029
PAGES 1 - 93

1	it.	09:38:16
2	A. Okay.	09:38:39
3	Q. Mr. Yeo, do you speak and understand some	09:38:39
4	English?	09:38:43
5	A. Very little.	09:38:50
6	Q. Okay. So I'll just ask that if I ask a	09:38:51
7	question, even if you do understand it, please wait	09:38:54
8	for the interpreter to translate before you give your	09:38:56
9	response.	09:39:00
10	A. Okay.	09:39:14
11	Q. The other thing which you seem to be doing	09:39:14
12	fine with so far is the court reporter can't take	09:39:17
13	down nods of the head, "uh-huh," "uh-huh," responses	09:39:21
14	like that. So it's important that you give a "yes"	09:39:25
15	or a "no" answer rather than any gesture or ambiguous	09:39:28
16	response.	09:39:32
17	A. Understood.	09:39:54
18	Q. And lastly, I am entitled to get your best	09:39:54
19	estimate for the questions I ask today. An estimate	09:39:58
20	is different from a guess. So if you don't know the	09:40:01
21	answer to a question saying "I don't know" is	09:40:04
22	perfectly fine.	09:40:06
23	A. I understand.	09:40:40
24	Q. Okay. And is Roypac currently your	09:40:40
25	employer, Mr. Yeo?	09:40:47

1	A. Yes.	09:40:53
2	Q. What is your title?	09:40:53
3	A. General manager.	09:40:58
4	Q. And how long have you been general manager?	09:40:59
5	A. I think it's been about 20 years.	09:41:01
6	Q. Okay. So since around 1997 roughly?	09:41:15
7	A. It was approximately around then. However,	09:41:30
8	I don't recall the exact time.	09:41:32
9	Q. Okay. And as general manager what are your	09:41:34
10	job responsibilities?	09:41:38
11	A. Sales-related tasks.	09:41:51
12	Q. Such as what?	09:41:52
13	A. I carry out a task relating to sales of the	09:41:53
14	Sam Yang Ramyun products that are imported from	09:42:12
15	Korea.	09:42:16
16	Q. What was your -- well, did you have a role	09:42:17
17	at Roypac prior to general manager?	09:42:20
18	A. No. I only did sales of Ramyuns.	09:42:36
19	Q. Have your responsibilities at Roypac been	09:42:39
20	more or less the same since you first began working	09:42:43
21	as general manager about 20 years ago?	09:42:45
22	A. That's correct.	09:43:04
23	Q. Were you ever employed by Sam Yang USA?	09:43:05
24	A. Yes.	09:43:11
25	Q. And when were you employed by Sam Yang USA?	09:43:14

1 A. Prior to 2000s. 09:43:28

2 Q. Okay. So -- 09:43:30

3 THE INTERPRETER: Hang on. Interpreter 09:43:32

4 correction: 09:43:56

5 THE WITNESS: I worked there around year 09:43:58

6 2000. 09:44:03

7 BY MS. BOWMAN: 09:44:03

8 Q. Okay. So when you said earlier that you 09:44:03

9 were employed by Roypac since around 1997, were you 09:44:05

10 employed by both Roypac and Sam Yang USA at the same 09:44:11

11 time? 09:45:50

12 A. Well, I never said a year, 1997 exactly, and 09:45:50

13 from 1988 to 1999 I worked for Roypac dba of -- oh, 09:45:56

14 I'm going to scratch that. 09:46:06

15 Let me start over. So from 1988 to 1999 I 09:46:07

16 worked for Sam Yang USA, and then from year 2000 to 09:46:16

17 present, I'm working for Roypac, dba SC Continent 09:46:22

18 Corporation. 09:46:28

19 Q. What was your role at Sam Yang USA? 09:46:28

20 A. Sales of Ramyun products. 09:46:43

21 Q. For Sam Yang Korea? 09:46:45

22 A. Yes. 09:46:53

23 Q. And were your responsibilities generally the 09:46:54

24 same when you were working for Sam Yang USA as they 09:46:56

25 were when you later began working for Roypac? 09:47:00

Page 11

1 A. Did you say year 2000 to 2016? That's the 09:53:36
2 timeframe? 09:53:41
3 Q. Correct. 09:53:42
4 A. Yes, it did change. 09:53:50
5 Q. When did it change? 09:53:51
6 A. What was the year timeframe that you 09:54:14
7 mentioned before? 09:54:15
8 Q. Between 2000 and 2016? 09:54:16
9 A. Jack Wang changed to Gary Yang, G-A-R-Y, 09:54:44
10 Y-A-N-G, phonetic, subject to verification. 09:54:50
11 Q. And then at some point did Michael Gin 09:54:54
12 replace Gary Yang; is that correct? 09:54:57
13 A. Yes, that's correct, he replaced him. 09:55:10
14 THE INTERPRETER: Oh, interpreter 09:55:13
15 correction: On a previous answer he also said that 09:55:14
16 "I continued to work there." 09:55:17
17 BY MS. BOWMAN: 09:55:19
18 Q. Okay. So the number of employees was 09:55:19
19 generally around three sales employees; is that 09:55:22
20 correct?
21 A. In general, there were two. 09:55:38
22 Q. Okay. And is it correct, Mr. Yeo, that at a 09:55:40
23 certain point Roypac took over Sam Yang USA's duties 09:55:52
24 of handling export sales of Sam Yang Korean products? 09:55:56
25 MR. MC DONOUGH: I'll object in so as far 09:56:16

1	BY MS. BOWMAN:	10:01:14
2	Q. Did you explain to your customers why the	10:01:14
3	invoices would be issued from SC Continent	10:01:17
4	Corporation?	10:01:23
5	A. No.	10:01:38
6	Q. Mr. Yeo, are you compensated for your work	10:01:45
7	by Roypac; in other words, do your paychecks or pay	10:01:50
8	stubs say "Roypac" or "Roypac dba SC Continent	10:01:53
9	Corporation"?	10:01:59
10	A. That's correct.	10:02:18
11	Q. Do you receive any compensation from Sam	10:02:18
12	Yang USA?	10:02:27
13	A. No.	10:02:27
14	Q. Are you paid a salary?	10:02:27
15	A. That's correct.	10:02:28
16	Q. Do you receive any commission payments?	10:02:32
17	A. No.	10:02:39
18	Q. Do you receive any performance bonuses?	10:02:39
19	A. No.	10:02:46
20	Q. Do you receive any other type of income from	10:02:46
21	Roypac other than your salary?	10:02:50
22	A. Yes.	10:03:10
23	Q. What other income do you receive from	10:03:11
24	Roypac?	10:03:14
25	A. It's not an income. Rather, I submit for	10:03:24

1 Q. Okay. So when did you first see Sam Yang 13:42:31
2 products in the L.A. area that were not distributed 13:42:37
3 or sold by Sam Yang USA or Roypac? 13:42:42
4 A. My recollection is that either end of 1990s 13:43:08
5 or the beginning of 2000s. 13:43:12
6 Q. Do you recall what stores or locations you 13:43:15
7 saw those products in? 13:43:19
8 A. Right now, I don't recall exactly what 13:43:43
9 stores or markets, because at the time, it was out 13:43:46
10 there in small quantity. 13:43:50
11 Q. Okay. And around that same time you said 13:43:55
12 that you also saw Sam Yang products, or rather, you 13:43:59
13 became aware that Sam Yang products were being sold 13:44:04
14 in other regions of the United States, correct? 13:44:08
15 A. Yes. 13:44:42
16 Q. And you were informed by your customers, and 13:44:42
17 I believe you named several of them, but you were 13:44:47
18 informed by several different customers that Sam Yang 13:44:49
19 products were being sold in other regions, correct? 13:44:52
20 A. Correct. 13:44:55
21 Q. Including on the East Coast? 13:45:12
22 A. Yes. 13:45:17

23 Q. And did you contact these stores or 13:45:17
24 locations where these products were being sold when 13:45:22
25 you learned about their sale? 13:45:25

1	A. No, I did not.	13:45:29
2	Q. Why not?	13:45:43
3	A. Because it was such a small quantity. I did	13:45:49
4	not pay particular attention, because it was not	13:46:01
5	making big impact on my sales activity, because it	13:46:06
6	was such a small quantity.	13:46:12
7	Q. Were you aware in 2008 that there were three	13:46:15
8	containers of Sam Yang products imported by	13:46:23
9	DY Imports into the United States?	13:46:28
10	A. I don't know about the year 2008 exactly,	13:47:12
11	but the business was being conducted. Did you say	13:47:18
12	three containers were brought in by DY Import?	13:47:22
13	Q. I asked if you were aware of it. Are you	13:47:29
14	aware of a different quantity of containers that were	13:47:31
15	brought in by DY Imports?	13:47:34
16	A. No, that's not what I'm saying. I'm saying	13:48:02
17	that we did business with them. However, as to how	13:48:05
18	many containers, I don't know.	13:48:10
19	Q. Okay.	13:48:11
20	A. I did business with them but as to whether	13:48:28
21	that was before that time or after that time, I'm not	13:48:32
22	sure.	13:48:37
23	Q. Do you recall having any communications with	13:48:37
24	them about Sam Yang products being sold on the East	13:48:42
25	Coast that were not imported by Sam Yang USA or	13:48:47

1 a right to review it before you start answering 13:51:44
2 questions. 13:51:46
3 THE WITNESS: Okay. 13:51:55
4 MR. MC DONOUGH: Whenever you're ready. 13:51:56
5 BY MS. BOWMAN: 13:51:58
6 Q. Just let me know whenever you've had a 13:51:58
7 chance to review. 13:52:02
8 A. I looked at it. 13:53:13
9 Q. Okay. And I'm looking at the last page of 13:53:14
10 this document, number 8. 13:53:17
11 A. Number 8, okay. Okay. 13:53:29
12 Q. Okay. And you mentioned that there are Sam 13:53:31
13 Yang products that are being imported in the eastern 13:53:37
14 regions of the United States by DY Import and by 13:53:40
15 Seohae Fishery. So you were aware in 2008 that 13:53:44
16 DY Import and Seohae Fishery were importing Sam Yang 13:53:52
17 products into the U.S., correct? 13:53:58
18 A. I heard that through a telephone call. 13:54:38
19 However, as to whom I have spoken with or who relayed 13:54:49
20 that to me, I'm not sure. 13:54:56
21 Q. So my question wasn't who gave you that 13:54:58
22 information, but it was that your understanding as of 13:55:02
23 2008 was that DY Imports and Seohae Fishery were 13:55:05
24 importing Sam Yang products into the U.S., correct? 13:55:10
25 A. It's not that I knew. I heard of that 13:55:40

1 through a telephone call, and it is not something 13:55:46
2 which I confirmed. 13:55:51
3 Q. Do you recall who sent you the samples that 13:55:53
4 you refer to in this document? 13:55:56
5 A. I do not recall. 13:56:07
6 Q. Did you contact Seohae Fishery to ask if 13:56:08
7 they were, in fact, selling these products that you 13:56:15
8 reference in number 8? 13:56:18
9 A. I did not. 13:56:32
10 Q. Did you ever sue Seohae Fishery regarding 13:56:33
11 the sale of the products that are referenced in 13:56:37
12 number 8? 13:56:39
13 A. I don't really know, and furthermore, I did 13:56:42
14 not have exact evidence. I had only heard it through 13:57:04
15 a call, so I don't really know. 13:57:08
16 Q. And so Sam Yang USA and Roypac never sued 13:57:14
17 Seohae Fishery or DY Import for importing Sam Yang 13:57:20
18 products referenced in number 8? 13:57:24
19 A. Correct. 13:57:41
20 Q. When you saw the Sam Yang products that were 13:57:46
21 not imported by Sam Yang USA or Roypac, did you check 13:57:54
22 the labels on the samples to see if an importer was 13:57:58
23 listed? 13:58:03
24 MR. MC DONOUGH: Vague, ambiguous, 13:58:22
25 overbroad. I don't know if you're referring to just 13:58:23

1	Q. Were you also responsible for mid-western	14:18:12
2	states in 1988?	14:18:15
3	A. Yes, I was.	14:18:26
4	Q. And for southern states?	14:18:27
5	A. Yes, I was.	14:18:33
6	Q. Between 1988 and 2016, how many times did	14:18:35
7	you visit Canada on behalf of Sam Yang USA or Roypac?	14:18:41
8	A. I've never been there.	14:19:00
9	Q. From 1988 to 2016, how many times did you	14:19:02
10	visit Mexico on behalf of Sam Yang USA or Roypac?	14:19:08
11	A. I've never -- I never went. I have been to	14:19:11
12	Mexico for personal reasons but not for business.	14:19:43
13	Q. Did you ever visit customers on the East	14:19:47
14	Coast of the United States between 1988 and 2016?	14:19:51
15	A. Yes.	14:20:05
16	Q. Which customers?	14:20:06
17	A. I visited Rhee Brothers. I visited Hanmi	14:20:17
18	New York. And a few markets of theirs.	14:20:30
19	Q. How many times did you visit Rhee Brothers	14:20:41
20	between 1988 and 2016?	14:20:44
21	A. I don't recall exactly, but a few times.	14:21:06
22	Well, maybe more times, one or two times.	14:21:09
23	Q. Did you visit Rhee Brothers after 1997?	14:21:14
24	A. No.	14:21:29
25	Q. How many times did you visit Hanmi New York	14:21:29

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1 between 1988 and 2016? 14:21:34

2 A. Once or twice. 14:21:47

3 Q. Did you visit Hanmi New York after -- I'm 14:21:48

4 sorry, did you visit Hanmi New York after 1997? 14:21:51

5 A. Oh, after '97? Oh, I think I misspoke when 14:21:55

6 I answered earlier. I visited the Rhee Brothers once 14:22:25

7 and Hanmi once. 14:22:29

8 Q. And was it on the same trip that you visited 14:22:33

9 Rhee Brothers and Hanmi? 14:22:36

10 A. Yes, that's correct. 14:22:55

11 Q. And was that one trip prior to 1997? 14:22:56

12 A. I don't know exactly, but I think I visited 14:23:00

13 once prior to that year and once after that year, but 14:23:22

14 I'm not exactly sure as to the years. 14:23:26

15 Q. Okay. And do you recall how many times you 14:23:36

16 visited markets of Rhee Brothers and Hanmi New York 14:23:42

17 between 1998 and 2016? 14:23:46

18 A. I don't recall exactly how many markets. 14:24:19

19 Q. Was it fewer than five? 14:24:25

20 A. I think it was more than five locations. 14:24:29

21 Q. Were those visits on the same trip when you 14:24:34

22 visited both Rhee Brothers and Hanmi New York? 14:24:38

23 A. Correct. 14:24:54

24 Q. Do you recall when the last time was that 14:24:54

25 you visited Rhee Brothers? 14:24:59

1	A. I don't remember.	14:25:07
2	Q. Was it before 2006?	14:25:08
3	A. I think it was prior to 2006.	14:25:19
4	Q. Do you think it was prior to 2003?	14:25:21
5	A. I don't recall exactly.	14:25:31
6	Q. Do you recall the last time you visited	14:25:32
7	Hanmi New York?	14:25:34
8	A. Likewise, I don't recall.	14:25:41
9	Q. Do you believe that that visit was also at	14:25:42
10	some point prior to 2006?	14:25:45
11	A. Yes.	14:25:57
12	Q. Who was your biggest customer -- and by	14:25:58
13	"your" I mean Sam Yang USA or Roypac's -- biggest	14:26:06
14	customer on the East Coast between 1997 and 2016?	14:26:11
15	A. You're saying after 1998 to present?	14:26:45
16	Q. I said 1997 but we can -- 1998 is fine,	14:26:51
17	sure, 1998 to 2016.	14:26:55
18	A. East Coast, right?	14:27:06
19	Q. Correct.	14:27:07
20	A. That would be Grand Super Center.	14:27:09
21	Q. But you never visited Grand Super Center	14:27:13
22	between 1998 and -- I'm sorry, yes, 1998 and 2016?	14:27:18
23	A. Correct. I did not visit.	14:27:23
24	Q. Did you ever visit any of your customers in	14:27:44
25	the mid-west region of the United States?	14:27:54

1 A. Are you saying mid-west region? 14:28:06

2 Q. In the mid-west region. 14:28:08

3 A. When you say mid-west, what pertains to the 14:28:10

4 west there? 14:28:15

5 Q. Well, when I asked you earlier who was 14:28:16

6 responsible for the mid-west region and you said 14:28:18

7 yourself, perhaps I should clarify what states you 14:28:20

8 were referring to when you told me you were 14:28:25

9 responsible for the mid-west region. 14:28:29

10 A. Well, as to L.A. area, I go around daily, 14:29:07

11 but even in the west, there are places that are far 14:29:12

12 from L.A. such as San Jose and northern California, 14:29:17

13 there's San Francisco and there's Las Vegas and 14:29:22

14 Phoenix, so I'm asking you to be a little bit more 14:29:25

15 specific when you say west. 14:29:30

16 Q. To confirm, was it translated as mid-west 14:29:34

17 rather than west? 14:29:38

18 THE INTERPRETER: Correct. 14:29:39

19 BY MS. BOWMAN: 14:29:42

20 Q. Okay. Were you responsible for sales in 14:29:42

21 Chicago? 14:29:45

22 A. Correct. 14:29:49

23 Q. Were you responsible for sales in St. Louis, 14:29:50

24 if any? 14:29:55

25 A. Correct. 14:29:55

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1	Q. Were you responsible for sales in Texas?	14:30:02
2	A. Yes.	14:30:07
3	Q. Were you responsible for sales in Atlanta?	14:30:07
4	A. Yes.	14:30:14
5	Q. Did you ever visit stores in any of those	14:30:15
6	regions?	14:30:18
7	A. Can you repeat those areas again?	14:30:32
8	Q. Chicago, St. Louis, Atlanta, Texas.	14:30:35
9	A. No, I've not -- I have never visited.	14:30:45

10	Q. Other than Rhee Brothers and Hanmi New York	14:30:50
11	and their markets on the East Coast and stores in	14:31:02
12	California, did you ever visit any other customers of	14:31:05
13	Sam Yang USA or Roypac between 1998 and 2016?	14:31:13
14	A. It was too long so I -- can you repeat that	14:31:16
15	once more?	14:32:04
16	THE INTERPRETER: Would you like the	14:32:06
17	interpreter?	14:32:07
18	MS. BOWMAN: Thank you.	14:32:07
19		
20	(Whereupon, the interpreter	
21	reinterprets the question for the	
22	witness.)	
23		14:32:09
24	MR. MC DONOUGH: Okay. And to the extent	14:32:37
25	you consider "visit" vague and ambiguous, it may be.	14:32:39

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1 She's referring in these lines of questions to you 14:32:41
2 traveling to those locations and visiting those 14:32:44
3 people there. 14:32:49

4 THE WITNESS: So if I went there on a 14:33:03
5 personal level for some kind of confirmation, does 14:33:05
6 that pertain, is that part of it. 14:33:10

7 BY MS. BOWMAN: 14:33:15

8 Q. No, and thank your counsel for clarifying. 14:33:15

9 I'm only referring to visits to the four 14:33:18
10 regions I mentioned to visit Sam Yang USA and Roypac 14:33:20
11 customers between 1998 and 2016. 14:33:23

12 A. No, I did not. 14:33:49

13 Q. Other than Rhee Brothers and Hanmi New York 14:33:50
14 and California, did Sam Yang USA or Roypac dispatch 14:34:01
15 any other employees to visit customers in any other 14:34:05
16 states or regions? 14:34:11

17 MR. MC DONOUGH: Vague, ambiguous as to 14:34:12
18 dispatch. 14:34:15

19 You may answer. 14:34:16

20 THE WITNESS: Yes, I have asked Jack Wang, 14:35:25
21 who was working under me, to visit while he was going 14:35:33
22 to that direction as a favor, but as an official 14:35:36
23 business capacity? No, he did not go there. 14:35:41

24 BY MS. BOWMAN: 14:35:47

25 Q. Why did you ask this employee to visit as a 14:35:47

1 time for a break. 14:46:51

2 MR. MC DONOUGH: Sure, thanks. 14:46:52

3 VIDEO OPERATOR: We're going off the record. 14:46:55

4 The time now is 2:46. This is -- ends Media 14:46:57

5 Number 2. 14:47:03

6 15:12:03

7 (Recess taken.)

8 15:13:49

9 VIDEO OPERATOR: We are on the record. Time 15:13:54

10 is 3:13 p.m. This begins Media Number 3. 15:13:56

11 Counsel, you may proceed. 15:14:01

12 BY MS. BOWMAN: 15:14:02

13 Q. Mr. Yeo, as the general manager in charge of 15:14:02

14 sales, was it your understanding that Roypac and Sam 15:14:09

15 Yang USA should do their best to increase sales of 15:14:15

16 Sam Yang products? 15:14:17

17 A. Yes. 15:14:36

18 Q. And you understood that Sam Yang USA and 15:14:37

19 Roypac should use their best efforts to promote the 15:14:40

20 sales and distribution of Sam Yang products? 15:14:44

21 A. Yes. 15:15:00

22 Q. And that included visiting retail stores and 15:15:00

23 customers, correct? 15:15:04

24 A. Yes. 15:15:13

25 Q. And that included convincing stores that 15:15:13

1	they should sell Sam Yang Ramyun, correct?	15:15:17
2	A. Yes.	15:15:31
3	Q. And you and your sales employees regularly	15:15:31
4	visited stores in the southern California area; is	15:15:34
5	that correct?	15:15:47
6	A. Yes.	15:15:47
7	Q. It was important to regularly visit these	15:15:48
8	stores in order to maintain and increase sales of Sam	15:15:50
9	Yang products?	15:15:52
10	A. Yes.	15:16:07

11	Q. And in order to use its best efforts, an	15:16:08
12	exclusive distributor should do whatever it can,	15:16:14
13	within reason, to try to increase the sales of that	15:16:17
14	product, correct?	15:16:19
15	MR. MC DONOUGH: Vague, ambiguous,	15:16:41
16	overbroad. Particularly with respect to best	15:16:44
17	efforts. Also legal conclusion.	15:16:46
18	You may answer.	15:16:48
19	THE WITNESS: Yes.	15:17:01
20	BY MS. BOWMAN:	15:17:02
21	Q. And an exclusive distributor should market	15:17:02
22	the products it's trying to promote, correct?	15:17:10
23	A. Yes.	15:17:24
24	Q. It should do what it can to increase brand	15:17:24
25	awareness for a product it's distributing?	15:17:27

1	A. Yes.	15:17:31
2	Q. And so based on your experience over the	15:17:38
3	past, I guess now it's been 30 or so years, what else	15:17:42
4	should a distributor do in order to use its best	15:17:48
5	efforts to distribute a product for a manufacturer?	15:17:51
6	MR. MC DONOUGH: Sorry. Same objections,	15:17:56
7	particularly as to best efforts.	15:17:58
8	You may answer.	15:17:59
9	THE WITNESS: That question seems very	15:18:11
10	broad. Are you asking about a particular area or	15:18:40
11	overall?	15:18:49
12	BY MS. BOWMAN:	15:18:50
13	Q. I'm asking overall and specifically a couple	15:18:50
14	moments ago I asked you if a distributor should use	15:18:53
15	its best efforts to distribute the product that it's	15:18:56
16	distributing, and you said yes, and now I'm trying to	15:18:59
17	ask you, what specific steps using those best efforts	15:19:01
18	entails.	15:19:07
19	MR. MC DONOUGH: Same objections.	15:19:08
20	You may answer.	15:19:10
21	BY MS. BOWMAN:	15:19:12
22	Q. In your experience.	15:19:12
23	A. First of all, in order to increase sales,	15:20:18
24	the mutual relationship with the manager is very	15:20:23
25	important. So one needs to foster relationship with	15:20:31

1 the manager, where one could talk about anything. 15:20:36

2 Before that, I think first and, most importantly, 15:21:13

3 it's the product's ability itself. 15:21:21

4 What I mean by that is, whether or not it's 15:21:24

5 a product consumer wants. So above and beyond any 15:21:26

6 kind of advertising, the product itself has to have 15:21:34

7 popularity that persuades the consumer to pick that 15:21:43

8 product. So even though you have the best of 15:21:47

9 relationship with a manager, if the product is not 15:21:52

10 something that consumer wants, then it's very 15:21:57

11 difficult to sell. 15:22:02

12 And third, well, in the U.S., most of the 15:22:05

13 consumers shop their grocery during the weekend. 15:23:25

14 What I mean by that is Thursday, Friday, Saturday, 15:23:31

15 and Sunday, and within the Korean community, 15:23:34

16 newspaper advertising is mostly -- most important. 15:23:38

17 And 90 percent of the shopping is done during over 15:23:46

18 the weekend. 15:23:51

19 And as to during the weekdays, no matter how 15:23:53

20 well the display is or whatnot, the sale during that 15:23:56

21 time is not that effective and as far as newspaper 15:24:04

22 advertising is concerned, a particular market would 15:24:09

23 pick popular item to be listed on the advertisement. 15:24:11

24 So even though we have the best of relationship with 15:24:18

25 the market or manager, unless it's a popular item, 15:24:23

1 they will not list it on the advertisement, and if 15:24:28
2 it's not a product which consumer seeks out, then, 15:24:32
3 then it is not listed on that advertising. 15:24:39

4 So over the years, I've done my best and put 15:24:42
5 out my best efforts to increase sales, but I have to 15:24:48
6 say, A, I have felt a certain limitation, and for 15:24:53
7 that effort, even though I make visits, like ten 15:25:02
8 times, 20 times or 100 times, and I ask them or -- or 15:25:07
9 ask them for favors based on my acquaintance with 15:25:14
10 them for long period of time, although they would 15:25:17
11 listen to my request most of the time, there have 15:25:20
12 been limitations in that effort. 15:25:27

13 Q. Okay. So to go over and break down these 15:25:35
14 things that you mentioned a little bit, in terms of 15:25:37
15 fostering relationships with managers, how did you 15:25:39
16 foster those relationships? 15:25:41

17 A. Well, fostering relationship, to me, is 15:26:13
18 visiting frequently, meeting them frequently, having 15:26:16
19 coffee or meals with them, hanging out with them, 15:26:20
20 just seeing them often. And also, find out the 15:26:25
21 circumstances of that particular manager's family, so 15:26:51
22 if they have family events, whether it's festive or 15:26:56
23 some sad events, always know about those events and 15:27:00
24 never miss attending such events of a particular 15:27:04
25 manager. And I think that is one of the ways where 15:27:09

1	you can have good relationship.	15:27:12
2	Q. So these in person interactions are	15:27:15
3	important to develop a personal relationship in	15:27:18
4	addition to the strict business relationship, right?	15:27:22
5	A. Correct.	15:27:36
6	Q. But during the time that you worked for Sam	15:27:36
7	Yang USA and Roypac, you really only had regular face	15:27:41
8	to face interactions with customers in California,	15:27:46
9	correct?	15:27:49
10	MR. MC DONOUGH: Misstates testimony	15:27:50
11	entirely.	15:27:51
12	You may answer.	15:27:58
13	The question is also vague, ambiguous,	15:28:19
14	overbroad as phrased.	15:28:22
15	THE WITNESS: No. That's incorrect. That's	15:28:23
16	incorrect. That's incorrect.	15:28:24
17	BY MS. BOWMAN:	15:28:30
18	Q. So you regularly visited stores outside of	15:28:30
19	California?	15:28:33
20	A. There is something that is even more	15:28:45
21	important than visiting stores.	15:28:47
22	Q. I'm sorry. My specific question was just	15:28:51
23	about the frequency with which you visited customers	15:28:54
24	outside of California.	15:28:57
25	A. When you say customer, what -- who are you	15:29:19

1 STATE OF CALIFORNIA) ss.

2 COUNTY OF LOS ANGELES)

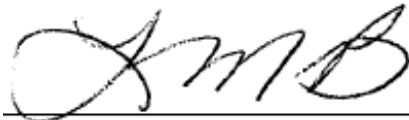
3 I, Lori M. Barkley, CSR No. 6426, do hereby
4 certify:

5 That the foregoing deposition testimony
6 taken before me at the time and place therein set
7 forth and at which time the witness was administered
8 the oath;

9 That the testimony of the witness and all
10 objections made by counsel at the time of the
11 examination were recorded stenographically by me, and
12 were thereafter transcribed under my direction and
13 supervision, and that the foregoing pages contain a
14 full, true and accurate record of all proceedings and
15 testimony to the best of my skill and ability.

16 I further certify that I am neither counsel
17 for any party to said action, nor am I related to any
18 party to said action, nor am I in any way interested
19 in the outcome thereof.

20 IN WITNESS WHEREOF, I have subscribed my
21 name this 22nd day of September, 2017.

22
23 
24

25 LORI M. BARKLEY, CSR No. 6426

EXHIBIT 20

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WEST DIVISION

SAM YANG (USA), Inc.,)
ROYPAC, INC., dba SC)
CONTINENT CORPORATION,)
Plaintiff,)
vs.) Case No.
SAMYANG FOODS CO., LTD,) 2:15-cv-07697 AB
and DOES 1 through 20,) (KSx)
inclusive,)
Defendants.)

SAMYANG FOODS CO., LTD)
Counter-Claimant,)
vs.)

SAM YANG (USA), Inc.,)
ROYPAC, INC., dba SC)
CONTINENT CORPORATION,)
MUN-K YUNG CHENm and)
DOES 1 through 20,)
inclusive,)
Counter-Defendants.)

CONTINUED VIDEOTAPED DEPOSITION OF WOON-BAE YEO
Los Angeles, California
Wednesday, October 25, 2017
Volume II

Reported by:

Lori M. Barkley, CSR No. 6426
Job No. 2739207
PAGES 94 - 153

1 and we will go ahead and do that. 08:23:17

2 A. Yes. 08:23:28

3 MS. BOWMAN: So I want to start with 08:23:29

4 Exhibit 1303. 08:23:30

5 (Exhibit 1303 was marked for identification 08:23:32

6 by the court reporter and is attached hereto.)

7 BY MS. BOWMAN:

8 Q. And this is just the notice of deposition 08:23:46

9 for your appearance here today. 08:23:48

10 Mr. Yeo, is it your understanding that 08:23:50

11 you're appearing to testify today pursuant to the 08:23:53

12 notice in front of you, Exhibit 1303? 08:23:54

13 A. Yes. 08:24:07

14 Q. So I want to start by looking at 08:24:22

15 Exhibit 1132D, please. 08:24:26

16 (Exhibit 1132D was marked for identification 08:24:27

17 by the court reporter and is attached hereto.)

18 BY MS. BOWMAN: 08:25:02

19 Q. Please just let me know once you've had a 08:25:02

20 chance to review this document. 08:25:07

21 A. Yes. Yes. 08:26:56

22 Q. Mr. Yeo, do you recall sending this document 08:26:57

23 on or around June 26th, 2014? 08:27:01

24 A. Yes. 08:27:12

25 Q. And are the statements that you make in this 08:27:13

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1	document true?	08:27:15
2	A. Yes.	08:27:21
3	Q. Now, Mr. Yeo, under number 3 here, you have	08:27:29
4	a statement that, for two or three years, Nagasaki	08:27:35
5	Champong has been imported in large quantities.	08:27:42
6	How much is a large quantity?	08:27:45
7	MR. MC DONOUGH: Vague ambiguous.	08:27:58
8	You may answer.	08:27:59
9	THE WITNESS: To my understanding since	08:28:20
10	2012, I believe that a large quantity of Nagasaki	08:28:22
11	products came in. However, I don't know exactly what	08:28:25
12	the quantity may have been, but I believe that it	08:28:28
13	came in containers.	08:28:30
14	BY MS. BOWMAN:	08:28:32
15	Q. So would you consider a container to be a	08:28:32
16	large quantity?	08:28:37
17	MR. MC DONOUGH: Vague and ambiguous.	08:28:43
18	You may answer.	08:28:44
19	THE WITNESS: That is what I was told from	08:28:53
20	the business that I dealt with on the East Coast.	08:28:55
21	BY MS. BOWMAN:	08:29:02
22	Q. What is what you were told by the business	08:29:02
23	that you dealt with on the East Coast?	08:29:04
24	A. I got a contact or I was contacted from the	08:29:24
25	stores from Rhee Bros or Hanmi located in New York on	08:29:28

1	East Coast, and that's what I was told.	08:29:34
2	Q. So what I want to know is: Were you told	08:29:38
3	that a container was a large quantity or were you	08:29:39
4	told that a container was being imported?	08:29:43
5	A. When something came in in a large quantity	08:30:11
6	that means that it came in in a huge quantity. If	08:30:13
7	something is come in in containers, it means that it	08:30:18
8	came in large quantity.	08:30:21
9	Q. So my question is: Was it your assessment	08:30:22
10	that a container constituted a large quantity or did	08:30:25
11	someone else inform you that a container was a large	08:30:28
12	quantity?	08:30:30
13	A. That's what I was told from the people that	08:30:54
14	I dealt with in East Coast.	08:30:56
15	Q. Do you personally think that a container is	08:30:59
16	a large quantity?	08:31:02
17	A. Yes.	08:31:09
18	Q. Okay. And the contacts from Rhee Bros or	08:31:09
19	Hanmi who told you that containers were being	08:31:18
20	imported, did they also tell you how they became	08:31:24
21	aware of the quantity of the imports?	08:31:26
22	A. So those people were the ones who would go	08:31:49
23	out to markets to sell the goods on behalf of us.	08:31:53
24	However, at that time we were not able to import	08:32:02
25	Nagasaki Champong.	08:32:06

1 However, the items that were imported were 08:32:09
2 in the markets throughout. That's why I was 08:32:18
3 contacted. 08:32:21

4 Q. My question -- 08:32:22

5 MS. SHIN: Hold on a second. He mentioned 08:32:23
6 (in Korean). 08:32:30

7 THE INTERPRETER: For domestic consumption, 08:32:32
8 is that what it is? 08:32:34

9 THE WITNESS: So the items for domestic 08:32:36
10 consumption was in the markets, that's why. 08:32:37

11 BY MS. BOWMAN: 08:32:46

12 Q. Okay. My question was: How did Hanmi and 08:32:46
13 Rhee Bros know the quantity of items that were in the 08:32:51
14 market that were being shipped? 08:32:55

15 MR. MC DONOUGH: Calls for speculation. 08:33:05
16 You may answer. 08:33:08

17 THE WITNESS: I was told that they were 08:33:14
18 displayed a lot, so I believe that that's why they 08:33:15
19 believe that the goods may have been shipped in 08:33:25
20 containers, because all the markets had the displays. 08:33:28

21 BY MS. BOWMAN: 08:33:33

22 Q. So they drew an inference based on the 08:33:33
23 quantity of products they saw in the market? 08:33:35

24 A. Correct. 08:33:44

25 Q. Okay. So anyone who was working in the 08:33:45

1 Q. Who sent it to you? 08:41:16

2 A. To my understanding, Rhee Bros or Hanmi 08:41:26

3 might have sent it. 08:41:29

4 Q. But you don't recall specifically whether it 08:41:31

5 was Rhee Bros or Hanmi? 08:41:33

6 A. I may have received it from both places. 08:41:41

7 Q. After you learned of these products that you 08:41:47

8 believe were for domestic consumption being sold in 08:41:50

9 stores, did you ever go to any stores to see the 08:41:54

10 product displays yourself? 08:41:55

11 A. I saw them in the places near Los Angeles. 08:42:11

12 Q. Which places in Los Angeles? 08:42:15

13 A. I don't know the exact names of the markets 08:42:28

14 in Los Angeles area. However, small quantity came in 08:42:30

15 for Los Angeles. 08:42:35

16 Q. How do you know what the quantity was that 08:42:36

17 came in to Los Angeles? 08:42:40

18 A. So they were not displayed -- then there I 08:42:50

19 saw the small quantity of the items on shelves. 08:42:55

20 Q. But you don't recall where you saw those 08:42:59

21 small quantities? 08:43:01

22 MR. MC DONOUGH: Asked and answered. 08:43:04

23 THE WITNESS: Correct. I cannot quite 08:43:07

24 recall all of a sudden aware. 08:43:09

25

1 seeing those products being sold in the market. 09:06:19

2 A. They would not know. 09:06:33

3 MR. MC DONOUGH: No, no, no, no, no, no, no. 09:06:34

4 She's simply asking you, essentially, when people, 09:06:37

5 whoever they may be, were telling you it was being 09:06:41

6 imported, did you ask them if they know who, yes or 09:06:44

7 no? 09:07:03

8 THE WITNESS: I did, but there was no one 09:07:03

9 who knew the information. 09:07:06

10 MR. MC DONOUGH: Hold on. I don't want 09:07:06

11 to -- just start with the "I did," then let her ask 09:07:07

12 her questions, okay? Start with that. Keep it 09:07:11

13 simple. 09:07:18

14 THE WITNESS: I did. 09:07:18

15 BY MS. BOWMAN: 09:07:19

16 Q. And why didn't they know or why wouldn't 09:07:19

17 they know who was importing the products? 09:07:22

18 A. Because they didn't know, they sent me the 09:07:32

19 samples. 09:07:34

20 Q. Couldn't they ask the markets where they 09:07:35

21 found these samples who were importing the products? 09:07:37

22 A. They would have asked. 09:07:51

23 Q. So I believe you just told me that they 09:07:55

24 wouldn't know this information, correct? 09:07:58

25 A. To my understanding, the markets would have 09:08:09

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1 known. However, they cannot say because they were 09:08:11
2 illegally imported. Because in terms of the 09:08:20
3 ingredients that was for the domestic consumption and 09:08:33
4 they were not fit for the items to be exported. 09:08:37

5 Q. And what is your basis for -- what is your 09:08:41
6 basis for saying that they were not fit to be 09:08:46
7 exported? 09:08:49

8 A. I cannot really tell you the specific basis, 09:09:12
9 but I was told by the managing director from Samyang 09:09:15
10 that the meat ingredient, it's not registered with 09:09:18
11 the FDA for Samyang products -- the FDA, the food and 09:09:21
12 drug administration. 09:09:30

13 Q. Okay. So is it your belief that these 09:09:34
14 markets where Samyang products for domestic 09:09:37
15 consumption were being sold, knowingly imported 09:09:41
16 products that were illegal? 09:09:43

17 MR. MC DONOUGH: Misstates testimony. 09:10:00

18 THE WITNESS: That was my suspicion. 09:10:06

19 MS. BOWMAN: Okay. Can we take a quick 09:10:08
20 break? 09:10:12

21 VIDEO OPERATOR: Off record. Time 9:09 a.m. 09:10:14

22

23 (Recess taken.)

24 09:27:46

25 VIDEO OPERATOR: We're on record. Time now 09:27:47

1 THE WITNESS: Your question is rather vague 10:26:33
2 and ambiguous, so it would be awkward to answer the 10:26:34
3 question. 10:26:36

4 BY MS. BOWMAN: 10:27:02

5 Q. Give me a second to see if I can ask this 10:27:02
6 question any more clearly than I have. 10:27:04

7 MR. MC DONOUGH: Sir, you're doing a great 10:27:12
8 job. If you don't understand the question, let her 10:27:13
9 know, and you can continue to ask your own very good 10:27:17
10 questions of clarification. 10:27:21

11 MR. SUH: It's getting lost in translation 10:27:21
12 in my opinion, but ... 10:27:23

13
14 (Whereupon a discussion was held off
15 the record.)
16 10:27:31

17 MS. BOWMAN: You know what, we'll just move 10:27:31
18 on from there, then, and if we have time, we'll -- 10:27:33
19 we'll come back to it, but okay. 10:27:36

20 Q. So, Mr. Yeo, the small quantities of Samyang 10:27:40
21 products that you stated you were aware of being sold 10:27:45
22 prior to 2012, when did you first become aware of 10:27:49
23 these quantities of products outside of California? 10:27:53

24 MR. MC DONOUGH: Asked and answered. 10:28:16

25 You may answer. 10:28:17

1	THE WITNESS: So before 2012, right?	10:28:25
2	BY MS. BOWMAN:	10:28:26
3	Q. Yes. When did you first become aware?	10:28:26
4	A. So all two thousands -- so 2002, 2003, or	10:28:44
5	2004, I am not sure, but I believe that it would have	10:28:49
6	been around that time.	10:28:51
7	Q. Okay. And also through agents or	10:28:53
8	wholesalers at that time?	10:28:55
9	A. Yes.	10:29:01
10	Q. Okay. And then -- and where were you aware	10:29:02
11	of those sales in 2002, 2003, or 2004?	10:29:09
12	A. It's been so long that I cannot quite	10:29:36
13	recall. I was told that small quantity of items were	10:29:38
14	in the markets, so I was notified. However, I don't	10:29:44
15	remember as to which vendor that I was informed by.	10:29:50
16	Q. Do you recall what the states were where	10:29:57
17	these products were purportedly being sold?	10:29:59
18	A. From East Coast side, from New York, I was	10:30:27
19	told that a small quantity was put on the shelves.	10:30:31
20	Q. What about in Washington D.C.?	10:30:36
21	A. I cannot recall exactly. It's been so long.	10:30:45
22	Q. Chicago?	10:30:48
23	A. For that place, I don't know whether the	10:31:00
24	products came into that area or not, I cannot quite	10:31:03
25	recall at this time. Now that I think back, the	10:31:09

1 STATE OF CALIFORNIA) ss.
2 COUNTY OF LOS ANGELES)
3

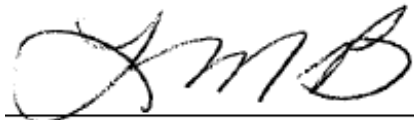
4 I, Lori M. Barkley, CSR No. 6426, do hereby
5 certify:

6 That the foregoing deposition testimony
7 taken before me at the time and place therein set
8 forth and at which time the witness was administered
9 the oath;

10 That the testimony of the witness and all
11 objections made by counsel at the time of the
12 examination were recorded stenographically by me, and
13 were thereafter transcribed under my direction and
14 supervision, and that the foregoing pages contain a
15 full, true and accurate record of all proceedings and
16 testimony to the best of my skill and ability.

17 I further certify that I am neither counsel
18 for any party to said action, nor am I related to any
19 party to said action, nor am I in any way interested
20 in the outcome thereof.

21 IN WITNESS WHEREOF, I have subscribed my
22 name this 26th day of October, 2017.
23

24 

25 LORI M. BARKLEY, CSR No. 6426

EXHIBIT 21

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

)
SAM YANG (U.S.A.), INC.;)
ROYPAC, INC., dba S.C.)
CONTINENT CORPORATION,)
)
Plaintiffs,) No. 2:15-cv-07697 AB (KSx)
)
vs.)
)
SAMYANG FOODS, CO., LTD.; and)
Does 1 through 20, inclusive,)
)
Defendants.)

)
)
AND RELATED ACTION.)

VIDEOTAPED DEPOSITION OF MICHAEL JIN
Los Angeles, California
Thursday, June 8, 2017
Volume I

Reported by:
NADIA NEWHART
CSR No. 8714
Job No. 2618653
PAGES 1 - 246

1 product to sell.

2 BY MS. BOWMAN:

3 Q Okay. So let's -- let's say prior to August
4 of 2016, so in the year of 2016, generally, what
5 were your responsibilities as sales manager? 09:43

6 A I would visit the -- my clients. I would
7 make sure that they -- they had enough product
8 stocked. I would handle any possible returns. I
9 would speak to the -- the buyer or the manager
10 regarding how the current market situation was and 09:43
11 if, you know, there was any situations or any --
12 anything that required my attention --

13 Q Okay.

14 A -- in a nutshell.

15 Q And when you were first hired in 2009 by 09:43
16 S.C. Continent, were you also a sales manager then?

17 A Yes.

18 Q And were your responsibilities the same more
19 or less when you were hired in 2009?

20 A Yes. 09:44

21 Q So have there been any changes to -- other
22 than since August of 2016, have there been any
23 changes to your job responsibilities as a sales
24 manager?

25 A No. 09:44

1 Q And you -- you said you're a sales manager.
2 Is that for all of the customers that S.C. Continent
3 manages, or do you have specific customers or
4 regions that you're responsible for?

5 A There were specific customers that I was 09:44
6 assigned.

7 Q And who were those customers?

8 MR. McDONOUGH: Vague as to time, overbroad.

9 You may answer.

10 THE WITNESS: Well, let's see. I think the 09:44
11 ones that I recall offhand would probably be the
12 ones I was handling most recently, would be -- did
13 you want the names or --

14 BY MS. BOWMAN:

15 Q The names if you recall them. 09:44

16 A One would -- Hannam Trade, Hannam Chain.
17 There's various branches to those markets, actually.
18 There's one in Torrance. There's one in Buena Park.
19 There's one in -- well, let's see here. There's a
20 few others, actually, that I didn't actually handle, 09:45
21 but several of the branches of Hannam Chain. Also,
22 Zion Market. Let's see here. Walong Marketing,
23 S-Mart. The ones I recall offhand for now.

24 Q And are all of these customers that you just
25 mentioned based in California? 09:45

1 A Yes, they are.

2 Q So as sales manager, were you primarily
3 responsible for California customers?

4 A Primarily, yes.

5 Q Were there any other regions that you were 09:45
6 responsible for outside of California?

7 A There was one other wholesaler that I also
8 was responsible for, and they sold in the Washington
9 region.

10 Q Washington State or Washington, D.C.? 09:46

11 A State.

12 Q Okay. And who is that customer?

13 A That was -- they were Seasia; later became
14 Wismettac.

15 Q Sorry. Could you say that again? 09:46

16 A Yeah. It's -- it's Wismettac. I believe
17 it's spelled W-i-s-m-e-t-t-a-c.

18 Q Okay. And you said you -- it was Wismettac;
19 it's --

20 A It was Seasia. They became Wismettac later. 09:46

21 Q I see.

22 MR. McDONOUGH: So just make sure to let her
23 complete her question.

24 THE WITNESS: Oh, sorry.

25 MR. McDONOUGH: You're doing a great job, but 09:46

1 May I ask a clarification? With regards to
2 my position, sales, or --

3 Q With regard to your position as sales
4 manager.

5 A No. 09:53

6 Q So you didn't have anyone reporting to you,
7 but who were the employees other than Mr. Yeo and
8 Mr. Lee who you interacted with most at Roypac?

9 A Actually, those two gentlemen were primarily
10 who I interacted with at the company. 09:54

11 Q Were they your managers or directors?

12 A They -- they were my superiors.

13 Q And when you interacted with them, what was
14 the nature of a -- sort of a typical interaction
15 that you would have as sales manager with your 09:54
16 superiors? What would you go to them for?

17 A Mr. Yeo, it would primarily be like, oh,
18 we're -- we're thinking of putting in a sale of X
19 product in X markets and does it have any conflicts
20 with, you know, the other markets that you're -- you 09:54
21 know, you're considering maybe doing a sale with?

22 Talk about -- we would talk about -- so
23 potential sales. We would talk about inventory.

24 We would discuss, you know, just product
25 placement, any market conditions. 09:55

1 Q Did you ever discuss Roypac's profits with
2 your superiors?

3 A No -- Roypac's profits? No.

4 Q Did you ever discuss Sam Yang (U.S.A.)'s
5 profits with your superiors? 10:08

6 A No, I did not.

7 Q And that's true during the duration of your
8 employment at Roypac?

9 A Yes, that's correct.

10 Q Okay. So did you have a budget for expenses 10:09
11 related to sales and distribution for your
12 customers --

13 MR. McDONOUGH: Vague.

14 BY MS. BOWMAN:

15 Q -- during -- during your time at -- at 10:09
16 Roypac?

17 MR. McDONOUGH: Vague and ambiguous,
18 overbroad as to time.

19 You may answer.

20 THE WITNESS: When you say "budget" -- 10:09

21 BY MS. BOWMAN:

22 Q Were you given, for example, a certain amount
23 of money that you could spend on developing customer
24 relationships, on providing different things that
25 your -- your customers may have asked for? 10:09

1 I see that you sold X amount --

2 A Yeah, of course.

3 MR. McDONOUGH: Wait. Don't --

4 THE WITNESS: I'm sorry.

5 MR. McDONOUGH: Let her finish. There's no 10:22
6 question.

7 BY MS. BOWMAN:

8 Q That's okay. So I -- I see that you sold X
9 amount. I really think you could sell X plus 10
10 percent. I want you to try to do that. Was that 10:22
11 the type of conversation you'd have?

12 A It would be something along those lines, yes.

13 Q Okay. So bottom line, it was your
14 responsibility to really do your best to distribute
15 Sam Yang's products to your customers -- 10:22

16 A Yes.

17 Q -- right? Okay. And -- so you said that
18 there were sort of certain sales that you wanted to
19 try to hit, which was essentially to sell more
20 because that's what a distributor does. 10:22

21 Were there any consequences that were imposed
22 by Roypac or Sam Yang (U.S.A.) that you were aware
23 of if you didn't sell more?

24 A No.

25 Q Were there any incentives or -- I guess any 10:23

1 incentives that you would receive if you did sell
2 more?

3 A No, there weren't.

4 Q Were you aware of any consequences for Roypac
5 if Roypac did not sell more, as -- as was their job 10:23
6 per your testimony?

7 A Not that I was aware of.

8 Q And you said you didn't have prior sales or
9 distribution experience before coming to Roypac,
10 correct? 10:23

11 A Yes.

12 Q Yes, you didn't have prior experience,
13 correct?

14 A No, I did not have prior experience.

15 Q Thank you. 10:23

16 So your understanding, really, of sort of
17 sales and distribution performance standards is
18 based on your time at Roypac and S.C. Continent and
19 what you observed and learned there; is that
20 correct? 10:24

21 A Yes, it is.

22 Q Okay. So while you were at Roypac, did you,
23 at some point, gain a better understanding of the
24 nature of the relationships between the two
25 companies, Roypac and Samyang Korea? 10:24

1 A Oh.

2 Q -- of a period?

3 A About one or two weeks.

4 Q And after those one or two weeks, did you

5 then go out on your own?

12:22

6 A Yes.

7 Q And where were the -- where were the markets
8 and wholesalers that you visited with Mr. Yeo
9 located, generally?

10 A It was quite a while ago, actually. I'd say
11 in the Los Angeles area.

12:22

12 Q Did you ever go with Mr. Yeo outside of the
13 Los Angeles area?

14 A No, I did not.

15 Q And after those one or two weeks when you
16 were then on your own, did you ever go outside of
17 the Los Angeles area to visit wholesalers or
18 markets?

12:23

19 A No, I did not.

20 Q Other than you, Mr. Yeo and Mr. Lee were
21 sales employees in 2009, were they also the only
22 other sales employees as of the beginning of 2016?

12:23

23 A Yes.

24 Q And does Mr. Yeo speak English fluently?

25 A No, he does not.

12:23

1 English with certain customers?

2 MR. McDONOUGH: Speculation.

3 You may answer.

4 THE WITNESS: I would -- I would think so,

5 yes. 12:24

6 BY MS. BOWMAN:

7 Q Did he also speak any other languages
8 fluently that you're aware of?

9 A He spoke Korean.

10 Q Okay. And you said that you -- most of your 12:24
11 customers were in California and there was one
12 customer in Washington; is that correct?

13 A Yes.

14 Q Okay. And were your California customers all
15 in the L.A. area or were they in other regions, as 12:25
16 well?

17 A They're all near the L.A. area.

18 Q Mr. Yeo and Mr. Lee, did they deal with
19 customers in certain geographic areas, as well?

20 MR. McDONOUGH: Vague and ambiguous. 12:25

21 THE WITNESS: Can you be a little bit more
22 specific with your question?

23 BY MS. BOWMAN:

24 Q Sure.

25 So Mr. Yeo, did he also deal with customers 12:25

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1 over time?

2 A I sort of came up with it over time.

3 Q And when you did push your -- well, was your
4 decision to push your customers to sell more ever
5 successful? 12:33

6 A At times.

7 Q And if it was successful, did you -- did you
8 get any sort of bonus or reward from Roypac for
9 increasing those sales?

10 A No, I did not. 12:33

11 Q Okay. Did you ever get any sort of bonus or
12 increased compensation for increasing your customer
13 sales from Roypac?

14 A No, I did not.

15 Q Did you have regular meetings with Mr. Lee 12:33
16 and Mr. Yeo to discuss your sales strategy?

17 MR. McDONOUGH: To discuss Mr. Jin's sales
18 strategy?

19 MS. BOWMAN: Mr. Jin's sales -- sales
20 strategy. 12:34

21 THE WITNESS: I mean, we would have meetings
22 specifically for discussing sales -- my -- no, not
23 my sales strategy.

24 BY MS. BOWMAN:

25 Q Did you have meetings to discuss Roypac's 12:34

1 sales strategy?

2 A Not -- no, not for discussing strategy, no.

3 Q Did you have regular sales meetings of some
4 sort with Mr. Lee or Mr. Yeo?

5 A Yes, we -- we would meet in the mornings and 12:34
6 discuss general happenings and some -- you know,
7 pertinent information we felt was going on regarding
8 our field.

9 Q What kind of information did you discuss
10 during these meetings? 12:34

11 A Company X is having a sale in this region
12 right now or, oh, this product seems to be moving
13 well somewhere or, oh, it looks like this product
14 seems to be moving kind of slowly. It was just
15 various sales-related factoids. 12:35

16 Q And were you -- were you each reporting
17 information from your customers and regions to the
18 other sales employees during these meetings?

19 A We would -- we would discuss some of the more
20 pertinent pieces of information, yes. 12:35

21 Q And how often did these meetings occur?

22 A On a daily basis.

23 Q During these meetings, did you ever discuss
24 sales goals for -- for particular customers or
25 regions? 12:35

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1 A No, we did not.

2 Q Did you ever prepare business plans for
3 particular customers or regions --

4 A No, we --

5 Q -- you personally? 12:35

6 A No, we did not.

7 Q Do you know if Mr. Yeo or Mr. Lee ever
8 prepared business plans for specific customers or
9 regions?

10 MR. McDONOUGH: Speculation, lacks 12:35
11 foundation.

12 THE WITNESS: Not that I'm aware of.

13 BY MS. BOWMAN:

14 Q You never saw any; is that correct?

15 A Yes. 12:36

16 Q So when you were -- okay.

17 So you visited stores in L.A., correct?

18 A Yes.

19 MR. McDONOUGH: Asked and answered.

20 BY MS. BOWMAN: 12:36

21 Q But you didn't visit any stores outside of
22 L.A. during the entirety of your employment -- or
23 outside of the L.A. area, Southern California area
24 during the entirety of your employment at Roypac; is
25 that correct? 12:36

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1 A Yes, that's correct.

2 Q Okay. And is it your understanding that your
3 customer in Washington, who you said was a
4 wholesaler, was responsible for visiting the -- the
5 retail outlets that they sold to in that area? 12:36

6 MR. McDONOUGH: Misstates testimony slightly.

7 You may answer.

8 THE WITNESS: Yes, the -- I -- more or less.

9 BY MS. BOWMAN:

10 Q So you never visited any stores in 12:36
11 Washington?

12 A No, I did not.

13 Q And you relied on your wholesaler to do that?

14 A Yes, I did.

15 Q And do you know if the wholesaler in 12:37
16 Washington also sold products for Samyang
17 competitors like Nongshim and Ottogi and Paldo
18 and -- or any others?

19 A To be honest, I'm not sure.

20 Q Do you know what other products your 12:37
21 wholesaler in Washington sold, if any?

22 MR. McDONOUGH: Overbroad as to time,
23 speculation, lacks foundation.

24 You may answer.

25 THE WITNESS: I would assume other grocery 12:37

1 Q What kind of research did you do?

2 A A lot of our information comes to us through
3 word of mouth when we're out in the field, when
4 we're talking to our customers. So I know of our
5 competitors. I know who they are. I, you know, 12:39
6 roughly know how much they sell or, rather, how --
7 what their ranking is, rather. So in that respect,
8 I know about the competitors.

9 Q So you're typically relying on information
10 that you hear from other customers and wholesalers 12:39
11 in the field?

12 A Yes.

13 Q And in your case, you were typically visiting
14 people in Southern California, so that would have
15 been information that you were getting from other 12:39
16 wholesalers and customers in Southern California?

17 A Yes.

18 Q Okay. During your time at Roypac, did you
19 track or measure sales by particular customer?

20 A No. 12:39

21 Q Did anyone at Roypac ever ask you to do that?

22 A No.

23 Q And you never had sales goals for particular
24 customers that were given to you?

25 A No. 12:40

1 Q Did you ever set your own sales goals for
2 particular customers?

3 A I would always try my best to sell as much as
4 I could. But as far as -- no.

5 Q How did you determine how much was as much as 12:40
6 you could sale -- sell?

7 A It -- based on experience, my experience on
8 the field and how -- how much that particular
9 customer may have been purchasing in, you know, past
10 invoices. 12:40

11 Q So when you first started in 2009, you didn't
12 have prior experience with any of these customers,
13 correct?

14 A Uh-huh.

15 Q So at that point, what were you relying on in 12:40
16 order to assess how much each customer should be
17 selling?

18 A Previous invoices.

19 Q And did you receive those from Gary Wang?

20 MR. McDONOUGH: Gary Yang. 12:41

21 MS. BOWMAN: Gary Yang. Sorry. Thank you.

22 THE WITNESS: No, I had to look up old
23 invoices.

24 BY MS. BOWMAN:

25 Q Okay. So you sort of set internal metrics 12:41

1 for what you thought sales should be based on what
2 prior sales had been?

3 A Yes.

4 MR. McDONOUGH: Vague as to "internal
5 metrics." 12:41

6 Please slow down.

7 THE WITNESS: Sorry.

8 MR. McDONOUGH: Thank you.

9 BY MS. BOWMAN:

10 Q Did you ever repair -- prepare any sales 12:41
11 reports or documents tracking how much customers
12 were selling?

13 A No, I did not.

14 Q Did you ever prepare any sales reports or
15 documents that showed how much your customers in 12:41
16 total were selling in the Southern California
17 region?

18 A Excuse me. Sorry about that.

19 Q No problem.

20 A Could you repeat the question? 12:41

21 Q Sure.

22 So for the Southern California region that
23 you primarily worked in as a whole, did you ever
24 prepare sales reports or documents for sales in
25 those regions? 12:42

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1 A No, I did not.

2 Q Are you okay?

3 A Yeah.

4 Can I have a second, actually?

5 MS. BOWMAN: Sure. 12:42

6 MR. McDONOUGH: We can't pick and choose too
7 much, but it's been close to an hour. Are you --
8 are you okay, or do you need to at least take a
9 break to -- it seems like you've got an episode
10 coming along, but -- 12:42

11 THE WITNESS: I know. Actually, I think -- I
12 think I'll take a little break if possible.

13 MR. McDONOUGH: Well, it's not going to be a
14 little break.

15 THE WITNESS: Oh. 12:42

16 MR. McDONOUGH: It's either a lunch break
17 or --

18 THE WITNESS: Let's go on a little longer. I
19 think I can manage for now.

20 MS. BOWMAN: Okay. 12:42

21 MR. McDONOUGH: Five, ten more minutes?

22 MS. BOWMAN: That works.

23 Q Okay. So other than invoices, were -- was --
24 were there any other metrics that you used in order
25 to assess your customer's performance during your 12:42

1 time at Roypac?

2 A No. That was my primary source of
3 information.

4 Q Were you ever provided with specific company-
5 wide sales goals to meet? 12:43

6 A No, I was not.

7 Q Did Mr. Yeo and Mr. Lee review or track sales
8 for your customers, to your knowledge?

9 A Not that I'm aware of.

10 Q And there weren't any consequences that you 12:43
11 were aware of if you didn't sell a certain amount to
12 a given customer?

13 A If sales look kind of low and -- and, you
14 know, to a certain customer, perhaps Mr. Yeo would
15 let me know verbally, hey, it looks like, you know, 12:43
16 sales are kind of dropping there. What's going on?

17 And, you know, we usually go with -- be a
18 reason for it, like, oh, you know, maybe Ottogi or
19 one of the competitors were heavily doing a demo
20 type -- you know, or sales in that area. So 12:44
21 whenever that occurred, sales would drop for all the
22 other companies for the time being.

23 Q Do you know if Mr. Yeo was looking at
24 competitor sales or just Samyang products
25 specifically when he had those conversations with 12:44

1 you?

2 A I'm not sure if he had access to other
3 company sales, but I would assume he wasn't just
4 looking at the sales from our sales.

5 Q Other than asking you why sales had dropped, 12:44
6 did he ever tell you that you needed to increase
7 sales for any of your customers generally, aside
8 from the situations where there was a specific drop?

9 A I mean, there would be times he would
10 encourage me, hey, can you -- let's try to really 12:44
11 push this product in this area or see if we can
12 increase sales here in this. But nothing -- that
13 would basically be it, though.

14 Q Did Mr. Yeo or Mr. Lee ever give you
15 suggestions for what you could do to increase sales 12:45
16 in a certain area?

17 A Apart from whatever, you know, training I had
18 received, not much, no.

19 Q And when you say training you had received,
20 do you mean when you first started in 2009? 12:45

21 A Yes.

22 Q So after 2009 until 2016, they never gave you
23 other instructions on what you could do to improve
24 sales?

25 A No. 12:45

1 response.

2 A Well, I'm -- I'm simply saying we provided
3 them the product that they purchased and distributed
4 to their -- their -- their retail network. To
5 increase sales specifically, I don't know firsthand 12:49
6 what they may have done to increase sales.

7 Q Did you give your wholesaler customer in
8 Washington specific goals for sales numbers of
9 Samyang products in that region?

10 A No, I did not. 12:49

11 Q Did you track their sales for Samyang
12 products in those regions?

13 A No, I did not.

14 Q So you didn't have any basis to determine how
15 effective -- how effectively they were selling and 12:49
16 distributing Samyang's products in that region?

17 MR. McDONOUGH: Misstates testimony,
18 argumentative.

19 You may answer.

20 THE WITNESS: For -- for Seasia? No, we did 12:49
21 not.

22 BY MS. BOWMAN:

23 Q Okay. And I believe you told me that the
24 customers that you were responsible for in the L.A.
25 area, The Hannam Group, Zion Market, Walong -- is 12:49

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1 A Yes.

2 Q Okay. And -- and what were those issues that
3 caused you to stop pursuing additional customers?

4 A When I -- when I spoke to my superiors
5 regarding the idea of possibly selling to Costco, 02:13
6 that was one example. At the time, the response I
7 got I -- was -- and it was in Korean when I
8 conversed with Mr. Yeo about this.

9 But what he told me in a nutshell was, we --
10 we don't -- we -- we're not getting enough -- we're 02:14
11 not going to be able to get enough product from
12 Korea, so it's -- you know, what are we going to
13 sell? It was a little bit of a sarcastic comment,
14 and I didn't understand it at the time, but I do
15 now. 02:14

16 Q So what did you understand him to mean at the
17 time?

18 A At the time, I wasn't sure what he was --
19 what he was referring to.

20 Q Did you ask? 02:14

21 A It seemed -- it seemed almost -- he just
22 said, "We -- we can't get enough product from
23 Korea."

24 At that point I just took that -- I mean, I
25 took that as a negative. And I said, "Okay, so I 02:14

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1 guess not."

2 Later on, I -- I realized why he had told me
3 what he told me, though.

4 Q Did he instruct you not to seek out
5 additional customers at that point because he didn't 02:15
6 believe you could get enough product?

7 A Well, that's what I took what he meant since
8 he said what -- you know, we can't get enough
9 product from Korea, so it would be pointless for you
10 to try to sell something we don't have. 02:15

11 Q So he instructed you not to seek out new
12 customers?

13 A When I asked him about the Costco.

14 Q Were there any other customers that you
15 suggested expanding to? 02:15

16 A CVS.

17 Q And did you suggest that to Mr. Lee?

18 A I mentioned it to Mr. Lee, as well.

19 Q And what was his response?

20 A It was -- it was a similar response. 02:15

21 Q Were there any other customers that you
22 suggested to Mr. Lee?

23 A Now, I'm not exactly sure. This is a
24 overbroad time frame here.

25 Q Sorry. I'm talking between 2012, when -- 02:15

1 approximately, when you said that the smell issue
2 was resolved, and two thousand -- August in 2016,
3 when the -- when the relationship, as I understand
4 it, ended.

5 A Al- -- yes, there was also another 02:16
6 distribution, a large distribution called Rockman
7 Trading -- Rockman USA, I think.

8 Q And you suggested selling to Rockman USA to
9 Mr. Lee?

10 A Yes. 02:16

11 Q And when was that, approximately?

12 A I believe it was sometime in 2015.

13 Q 2015.

14 And what was Mr. Lee's response?

15 A Once again, it was similar. We can't get 02:16
16 enough product to distribute to them, as well.

17 Q Do you recall when in 2015 you made that
18 suggestion?

19 A It was -- I believe it was sometime late
20 2015. 02:16

21 Q Okay. And just to backtrack, you also
22 recommended CVS.

23 Did you -- do you recall roughly when you
24 made that recommendation to Mr. Lee?

25 A That was a bit earlier on, around -- between 02:17

1 2012, 2013.

2 Q And what about Costco?

3 A That was similar, 2012, 2013.

4 Q And were there any other customers that you
5 recommended to Mr. Lee in that period between 2012 02:17
6 and 2016?

7 A There was also -- U.S. Trading is another
8 distributorship in San -- based in Northern
9 California.

10 Q And when did you recommend U.S. Distributing? 02:17

11 A U.S. Trading?

12 Q U.S. Trading. I'm sorry.

13 A That was also late 2015, early 2016.

14 Q And what was Mr. Lee's response?

15 A Once again, problem, not enough product. 02:17

16 Q Are there any other customers that you recall
17 recommending to Mr. Lee during that period?

18 A Those are what I can recall for now.

19 Q Okay. So U.S. Trading, Rockman, CVS and
20 Costco are the four customers that you can recall as 02:17
21 you sit here today recommending to Mr. Lee during
22 that --

23 A Yes.

24 Q And his response to all of his customers was
25 that there was no point in pursuing them because you 02:18

1 couldn't get enough product?

2 MR. McDONOUGH: Misstates testimony.

3 THE WITNESS: I -- I suppose to put it

4 simply, yes.

5 BY MS. BOWMAN:

02:18

6 Q Did you -- did he ever suggest that you reach
7 out to any other customers besides -- or prospective
8 customers besides the four that you just mentioned
9 about potential sales from Roypac?

10 MR. McDONOUGH: Vague as to time.

02:18

11 THE WITNESS: Well, I guess not, considering
12 the ones I've mentioned were -- we had issues trying
13 to move forward with those, so no.

14 BY MS. BOWMAN:

15 Q And at any point before or after you spoke to
16 Mr. Lee about these four customers, so I guess for
17 each of them -- we can take them one by one. So
18 let's start with Costco.

02:18

19 Did you reach out to Costco about possibly
20 purchasing products from Roypac prior to speaking to
21 Mr. Lee?

02:19

22 A No. I felt it would be unprofessional to do
23 so.

24 Q So you came up with the idea that -- Costco
25 wasn't carrying Samyang products, correct?

02:19

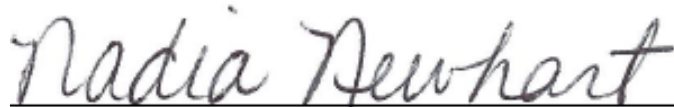
1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were placed under oath; that a
8 verbatim record of the proceedings was made by me
9 using machine shorthand which was thereafter
10 transcribed under my direction; further, that the
11 foregoing is an accurate transcription thereof.

12 I further certify that I am neither
13 financially interested in the action nor a relative
14 or employee of any attorney of any of the parties.

15 IN WITNESS WHEREOF, I have this date
16 subscribed my name.

17
18 Dated: June 21, 2017
19
20
21

22 
23

24 NADIA NEWHART

25 CSR No. 8714

EXHIBIT 22

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UNITED DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
CASE NO. 2:15-CV-07697-AB-KS

SAM YANG (U.S.A.), INC.; ROYPAC,
INC. dba S.C. CONTINENT
CORPORATION,
Plaintiffs,

vs.

SAM YANG FOODS CO, LTD,; and
Does 1 through 20, inclusive,
Defendants.

- - - - -
AND RELATED COUNTER-CLAIM
- - - - -

Videotaped Deposition of HEEJOO CLAIRE
HONG, taken at 290 West Mt. Pleasant
Avenue, Livingston, New Jersey, commencing
at 9:20 a.m., Friday, August 25, 2017,
before LAURA A. BURNS, a Certified Court
Reporter of the State of New Jersey.

JOB No. 2660736
PAGES 1 - 90

1 A. Yes.

2 Q. All right. Simplify things just a
3 little bit.

4 Mr. Suh and I represent Sam Yang USA.

5 A. Right.

6 Q. What role, if any, did you play in the
7 import of Sam Yang Korea Ramen to the United States?

8 A. Make sure they go to custom to process to --
9 to receive the merchandise, so they would go
10 through -- with the problem with our customs, that's
11 all that was.

12 Q. Did T. Up ever have any problems with
13 customs in terms of getting Sam Yang Korea product
14 into the United States?

15 A. No, not that I recall.

16 Q. Are you familiar with the product
17 called Nagasaki Champong?

18 A. Yes.

19 Q. Is that a Sam Yang Korea product that
20 T. Up imported into the United States?

21 A. Yes.

22 Q. Do you recall the years that T. Up
23 imported that particular product into the
24 United States?

25 A. No, not exactly.

1 Q. What's your best estimate of when
2 T. Up imported that product into the United States?

3 A. Maybe three, four -- four years ago.

4 Q. Three or four?

5 A. Yeah. No, I'm sorry, it was like five.
6 Maybe five, five or six.

7 Q. Did T. Up ever experience any problems
8 importing Nagasaki Champong into the United States?

9 A. No.

10 Q. Did T. Up ever hear of any other
11 distributors having problems importing
12 Nagasaki Champong into the United States?

13 A. Am I aware? What was the question, I'm
14 sorry?

15 Q. I will rephrase it.

16 The T. Up ever become aware of any
17 other distributors having problems importing
18 Nagasaki Champong into the United States?

19 A. No.

20 Q. Do you know why T. Up is no longer
21 importing Sam Yang Korea products into the United
22 States?

23 A. I -- we are told they -- they are trying to
24 give one specific company for all the distribution.

25 Q. What's that company?

1 ingredients.

2 Q. At any point in time did you have any
3 problems, issues, concerns raised by any government
4 agency with respect to any Sam Yang Korea products
5 T. Up was importing into the United States?

6 A. I can't recall. I think there was -- there
7 wasn't any problem.

8 Q. No problem?

9 A. No.

10 Q. Not even with Nagasai Champong?

11 MS. BOWMAN: Objection, leading.

12 A. I don't recall.

13 Q. Would Mr. Roh know if there were any
14 such concerns?

15 A. Yes.

16 Q. Would he have more knowledge than you?

17 A. No.

18 Q. Why wouldn't he know anything like
19 that?

20 A. It's -- it's more of my work description than
21 he.

22 Q. But you would report up to him with
23 respect to those issues?

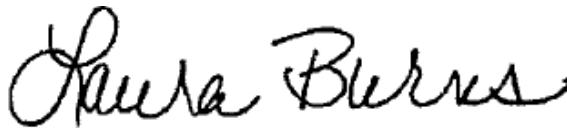
24 A. Yes.

25 Q. The V -- VS form, is that --

C E R T I F I C A T E

I, LAURA BURNS, a Certified Court Reporter and Notary Public of the State of New Jersey, certify that the foregoing is a true and accurate transcript of the stenographic notes of the deposition of said witness who was first duly sworn by me, on the date and place hereinbefore set forth.

I FURTHER CERTIFY that I am neither attorney, nor counsel for, nor related to or employed by, any of the parties to the action in which this deposition was taken, and further that I am not a relative or employee of any attorney or counsel in this case, nor am I financially interested in this case.



LAURA BURNS, C.C.R.

LICENSE NO.30X100218200

EXHIBIT 23

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IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

SAM YANG, (USA) INC,
et al.

Plaintiffs

vs.

Civil Action No.

2:15-CV-07697-AB-KS

SAMYANG FOODS CO., LTD.

Defendants

_____/

CONFIDENTIAL

The Videotaped Deposition of SEUNG HOON LEE,
as translated by ANNIE LEE, Certified Korean Interpreter,
was held on Thursday, September 28, 2017, commencing at
9:23 a.m., at Gore Brothers Reporting & Videoconferencing,
10440 Little Patuxent Parkway, Suite 900, Columbia,
Maryland 21044, before Deborah Cohen, Notary Public.

REPORTED BY:

Deborah Cohen

Job No. 2688604

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Page 1

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1 Q. I'll do it year by year then. So, Seohae
2 USA sold or distributed Samyang manufactured ramen in
3 2007, correct?

4 A. Yes that's correct.

5 Q. Did it do so in 2008?

6 A. Yes.

7 Q. Did it do so in 2009?

8 A. Yes.

9 Q. Did it do so in 2010?

10 A. Yes.

11 Q. What about 2011?

12 A. No.

13 Q. And it was about 2011 when Seohae USA
14 essentially closed and you opened ENI, correct?

15 A. Yes.

16 Q. So, just limiting it to 2007 for now, to
17 what geographic regions did Seohae USA sell or
18 distribute Samyang manufactured ramen?

19 A. I believe it was Maryland and Virginia area
20 or region.

21 Q. Did Seohae USA sell or distribute Samyang
22 Korea manufactured ramen in 2007 anywhere other than
23 the Maryland and Virginia area?

24 A. I think not.

25 Q. Still focusing on 2007, this ramen that

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1 either laughing or smiling is just because I'm not used
2 to this kind of environment, you know, objections and
3 whatnot.

4 Q. Sir, in 2007 when Seohae began importing
5 SamYang ramen through Jin Heung, did you have a
6 particular contact or contacts at Jin Heung?

7 A. Yes, there was.

8 Q. Just focused on 2007, who was that
9 individual or individuals who were your main contacts
10 at Jin Heung for purposes of importing Samyang ramen?

11 A. Wonkeun Park, the president.

12 THE INTERPRETER: Phonetic spelling of the
13 name is W-O-N-K-E-U-N P-A-R-K. The phonetic spelling
14 was provided by the interpreter.

15 Q. Is Mr. Park a relative of yours?

16 A. Yes.

17 Q. What type of relative?

18 A. My older sister's husband.

19 Q. In 2007 did you have any other relatives
20 affiliated with Jin Heung?

21 A. No.

22 Q. Sir, do you recall what Mr. Park's title at
23 Jin Heung was in 2007?

24 A. He was the president.

25 Q. Did Mr. Park approach you in 2007 to discuss

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1 the concept of importing Samyang Korea ramen to the
2 United States?

3 A. No.

4 Q. Did you approach him about that concept?

5 A. Yes.

6 Q. Why did you approach Mr. Park to discuss the
7 concept of importing Samyang Korea ramen to the United
8 States?

9 A. At the time in Maryland and in Virginia area
10 there were many markets, Korean owned markets. You
11 know, like, they're international markets, I might say.
12 And the people who work there and also the owners of
13 those markets, they were telling me that it was
14 difficult for them to purchase Samyang products. So,
15 they asked me about them many times. And at the time,
16 we were purchasing products, this and that, you know,
17 kinds of products through or from Jin Heung. So, I
18 asked Jin Heung or told Jin Heung that, you know, we
19 would like to do this, can you ship this to us.

20 Q. What about the market that you owned? Was
21 it selling ramen in 2006?

22 A. No.

23 Q. Selling no ramen?

24 A. In 2006, the business itself was not there.

25 Q. When did you purchase the grocery store?

1 Q. And sir, is it your testimony that in this
2 time period you're starting to hear from these market
3 owners that they can't sell Samyang ramen? Is it your
4 testimony, sir, that in this time period, 2006 and
5 2007, that that's when these Korean market owners were
6 starting to approach you about the concept of selling
7 Samyang ramen in their markets?

8 MS. CHOI: Objection. Asked and answered.
9 You can answer.

10 A. So, that is -- you know, we go out there to
11 do our sales of our company products at the grocery
12 stores. For example, you know, other companies like
13 Nongshim and, you know, other products from other
14 companies, the supplies of those products were very
15 smooth, whereas the supplies of Samyang products were
16 not so smooth. So, the owners and the managers were
17 asking me if we could do that. And they were asking me
18 if we could, they asked me to do that because when the
19 supply is not being done smoothly, those people tend to
20 ask their existing business clients for that. That's
21 why.

22 Q. As translated, you used the phrase "not so
23 smooth" and "not smoothly" pertaining to Samyang Korean
24 ramen. Who was telling you those sorts of things?

25 A. It's not 2007. So, I do not recall that

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1 much, going back to that time frame.

2 Q. Fair enough. I'm not intending to ask you
3 to identify a particular store owner who may have said
4 it. But is it fair to say that it was the store owners
5 who were telling you that the Samyang ramen products
6 were not being sold smoothly or not being distributed
7 smoothly? Was that their phraseology?

8 A. It wasn't limited to the owners only. As I
9 remember correctly, if I remember correctly, as I said
10 earlier, not only the owners, but also the managers of
11 those places told me that.

12 Q. What sorts of things generally do you recall
13 the managers and the owners telling you with respect to
14 Samyang Korea ramen?

15 MS. CHOI: I'm going to object just because
16 it's a little ambiguous. Are you talking about the
17 products themselves? The distribution of those
18 products? Which grocers? Which owners? Which
19 managers?

20 Q. You may answer.

21 MS. CHOI: But if you know, you may answer.

22 A. The question is overbroad. So, if you ask
23 me specific questions, I think I can answer.

24 Q. I'll try. And look, I get it's ten years
25 ago. And I also understand it's a little bit

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1 anecdotal. I'm just trying to get a sense of what you
2 recall hearing from the store owners, managers,
3 etcetera regarding Samyang Korea ramen in the 2006,
4 2007 time period.

5 A. If my memory serves me correctly, they
6 wanted to sell Samyang products, but the supply was not
7 there. So, without the supplies, they couldn't. But
8 in Korea, you know, Samyang ramen, you know, that is --
9 so, anyhow, Samyang ramen is the main thing in Korea.
10 But then here they had Nongshim Paldo Ottogi that they
11 could sell those, but they could not sell Samyang ramen
12 because they did not have them. Therefore, I believe
13 that's why they requested us to do that.

14 MS. SHIN: Just a slight correction. I
15 think he said the main things in Korea were Nongshim
16 and Samyang, not just Samyang.

17 THE INTERPRETER: May I clarify that with
18 the witness?

19 MS. SHIN: Sure.

20 THE INTERPRETER: Samyang and Nongshim.

21 MR. SUH: I only heard Samyang, but that's
22 fine.

23 A. So, yeah, I did say that main Samyang and
24 Nongshim. The reason for that is because at the time
25 Nongshim was number one and Samyang was number two.

1 That's why.

2 Q. Hearing these things to which you just
3 testified caused you or led you to contact your older
4 sister's husband, Mr. Park, to see if you guys could
5 arrange for the import of Samyang Korea ramen, right?

6 A. Yes, that's correct.

7 Q. Prior to reaching out to Mr. Park, did you
8 have any understanding that any other entity at that
9 time was importing or distributing Samyang ramen in the
10 United States?

11 MS. CHOI: I'm going to object. It's
12 ambiguous. It's a little confusing. But if you know.

13 A. Are you referring to me?

14 Q. I am.

15 A. I did not know about that.

16 Q. When you contacted Mr. Park for the reasons
17 we've been discussing, did he by any chance identify
18 for you whether or not some other entity was
19 distributing or selling Samyang ramen in the United
20 States?

21 A. Based on what I can recall, I think there
22 was none.

23 Q. There was none that Mr. Park told you about?

24 A. What was the question about?

25 Q. I'm just asking you, when you spoke with

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1 MS. CHOI: Samyang Korea could have been
2 talking to their attorneys.

3 MR. MCDONOUGH: I don't know. I'm just
4 talking about what he did.

5 Q. All right. So, my question to you is, in
6 2007, sir, did you speak to anyone at Samyang Korea,
7 other than Samyang Korea lawyers, regarding importing
8 their ramen into the United States?

9 A. Even though I do not have the exact
10 recollection about that, however, I think not.

11 Q. So, with respect to the import of Samyang
12 Korea ramen into United States in 2007, your
13 communications were only with Jin Heung, correct?

14 A. I believe so.

15 Q. Let's go to 2008. Seohae USA imported --
16 strike that. Did Seohae USA import through Jin Heung
17 Samyang Korea ramen in 2008?

18 A. Yes.

19 Q. What geographic regions did Seohae USA
20 distribute that ramen into?

21 A. I do not have the exact recollection about
22 that. However, since we provided the supplies in 2007
23 to the Maryland and Virginia area, I'm thinking
24 possibly it was Maryland and Virginia region plus
25 possibly New York, but it may not be accurate. My

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1 recollection might not be accurate. But it's possible
2 that we supplied the products to the New York area.

3 Q. In 2008?

4 A. Yes.

5 Q. Sir, do you recall how much Samyang Korea
6 ramen Seohae USA imported in 2008?

7 A. My opinion -- I don't have the exact
8 recollection about that, though. However, possibly --
9 well, approximately, I think -- well, at the time, it's
10 possible that it was around \$200,000 dollars. That's
11 what I can recall, but it may not be accurate.

12 Q. Thank you. Remember, just testing what you
13 know. And I recognize it's eight, ten years ago.
14 Okay?

15 A. Yes. Thank you.

16 Q. We appreciate you're doing your best. It's
17 helpful. Do you have a recollection of having sold
18 more Samyang ramen in 2008 than you did in 2007?

19 A. I believe that it's a given.

20 Q. Why is it a given?

21 A. Well, because we started it in 2007. And
22 that's why I think that it was probably a small volume
23 because we just started it. And when I talk about the
24 distribution kind of business, you know, you start the
25 business and immediately the following year it would be

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1 the name has been provided by the interpreter.

2 S-A-N-G-H-E-E. Last name C-H-U-N.

3 A. And then Sang Il Lee.

4 THE INTERPRETER: S-A-N-G I-L. Last name
5 L-E-E.

6 A. Woojoon Lee.

7 THE INTERPRETER: The phonetic spelling of
8 the name is being provided by the interpreter.

9 W-O-O-J-O-O-N. L-E-E last name.

10 A. That's just about I can remember.

11 Q. Good with that. 2009, did Seohae USA
12 continue to sell or distribute Samyang Korea ramen in
13 the United States?

14 A. Yes.

15 Q. What geographic regions?

16 A. At the time, I believe that we did that in
17 Maryland, Virginia and New York. That's what I recall.

18 Q. Pretty much the same places as 2008?

19 A. I really don't have the exact information.
20 However, based on what I can recall, I believe so.

21 Q. Compared to 2008, did sales increase, stay
22 the same or decrease in 2009?

23 A. I believe it was more.

24 Q. What is your best estimate, as you sit here
25 eight years later, of the amount of Samyang Korea ramen

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1 Seohae USA sold or distributed in the United States in
2 2009?

3 A. When you say the amount, are you referring
4 it to the dollar amount or the volume?

5 A. Fair enough question. You testified that in
6 2008 you believe you sold about \$200,000 dollars worth
7 of Samyang Korea ramen. Do you recall that testimony?

8 A. Yes.

9 Q. And that testimony was U.S. dollars,
10 correct?

11 A. Yes.

12 Q. So, using dollars as a frame of reference,
13 do you believe you sold more, less or the same Samyang
14 Korea ramen in the U.S. in 2009?

15 A. I believe we sold more.

16 Q. What is your best estimate of how much more
17 you sold in 2009 than 2008 in U.S. dollars?

18 A. I do not recall. I honestly do not have a
19 good recollection about that. But I believe it was
20 something in between \$300,000 and \$400,000 dollars.

21 Q. In total sales in the United States in 2009?

22 A. Are you referring to Samyang only?

23 Q. Yes.

24 A. I believe that was it.

25 Q. Did you, sir, speak with anyone at Samyang

1 Korea, other than possibly lawyers, regarding the
2 import of Samyang Korea ramen in 2009?

3 A. Based on what I can recall, no. The reason
4 for that is because any business related matters in
5 Korea were handled by Jin Heung. So, we did not really
6 contact Samyang Korea. And I recall that we did not
7 have any reason to contact them.

8 Q. So, at least in 2007, 2008 and 2009, any
9 discussions you had regarding the import of Samyang
10 Korea ramen into the United States was with Jin Heung
11 only, correct?

12 MS. CHOI: Objection. Asked and answered.
13 You may answer.

14 A. Based on what I can recall, you know, based
15 on what I can remember, I believe it was done with Jin
16 Heung only.

17 Q. In 2007, 2008 and 2009, did Seohae USA
18 import any other brands of ramen other than Samyang
19 Korea?

20 A. Other brands ramen?

21 Q. Mm-hmm.

22 A. I think not.

23 Q. We got a few more minutes on the tape, so
24 let's just do 2010. Did Seohae USA import Samyang
25 Korea ramen in 2010?

~~CONFIDENTIAL~~

1 A. Yes.

2 Q. What geographic regions did it sell that
3 ramen in?

4 A. Well, it may not be accurate. However, I
5 believe perhaps we expanded our business clients to the
6 East Coast. I mean the East Coast area.

7 Q. What do you mean by the East Coast area?
8 What cities?

9 A. So, we had the existing, you know, the
10 region, Maryland, Virginia and New York. So, we did
11 that. And then in 2010 I recall that possibly we went
12 to Chicago area.

13 Q. Sir, what is your best estimate of the
14 amount of sales of Samyang Korea ramen in U.S. dollars
15 in 2010?

16 A. I do not have the exact recollection about
17 that. I'm really just estimating. So, I'm thinking
18 maybe the sales went up a little bit. So, I think that
19 it was something like in between \$400,000 dollars and
20 \$500,000 dollars.

21 Q. So, as I'm hearing it, in 2007, of Samyang
22 Korea ramen sold in the United States, you sold not a
23 lot in 2007. Best estimate 2008 \$200,000. Best
24 estimate 2009 \$300,000 to \$400,000 thousand. Best
25 estimate 2010 \$400,000 to \$500,000?

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1 A. In 2010, about 2010, earlier I said it would
2 be between \$400,000 and \$500,000 dollars. But I
3 believe in 2010 we sold a bit more.

4 Q. So, \$500,000 to \$600,000?

5 A. I believe we sold about \$700,000 dollars. I
6 think that the sales volume went up a bit.

7 Q. In 2010 to approximately, best estimate
8 seven years later, \$700,000 dollars, right?

9 A. Yes, I believe so, based on what I can
10 recall.

11 Q. I get it. Let's take a break.

12 THE VIDEOGRAPHER: The time is 11:34. This
13 concludes Tape 1 of today's deposition. We are off the
14 record.

15 (A brief recess was taken.)

16 THE VIDEOGRAPHER: The time is 11:51. We
17 are back on the record for Tape 2.

18 Q. Sir, who at Seohae USA made the decision to
19 begin selling Samyang Korea ramen in New York?

20 A. I did.

21 Q. What were the factors that went into that
22 decision to begin selling Samyang Korea ramen in New
23 York?

24 A. Well, at the time, we put in our effort.
25 However, the business clients, they -- I believe they

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1 wanted the products to be supplied as well. Therefore,
2 I believe that's how it got started --

3 Q. What does --

4 A. -- because at the time Samyang products were
5 not supplied to grocery stores generally speaking in
6 the East Coast area. So, there was some difficulty
7 with purchasing of Samyang products. Therefore, since
8 we had the products, I believe they requested them.

9 So, in 2010, the reason why the sales got
10 increased in 2010 is because we did the tasting the
11 samples and those kind of events at the grocery stores.
12 So, we provided the support for those kind of
13 demonstration tasting events. So, that means we spent
14 money to do that. And then the sales got increased.
15 Perhaps that's why from this place or another place,
16 here and there they contacted us. So, I believe that's
17 how the sales got increased. And that's the reason why
18 I told you earlier that it was around \$700,000 dollars.

19 Q. So, are you saying that the sales increase
20 from 2009 when it was \$300,000 to \$400,000 to 2010 when
21 it was about \$700,000 is based upon sales in New York?

22 A. I don't think that would be the only reason
23 because we did not sell a lot in New York area. So, I
24 don't think New York is the only reason for that.

25 Q. The first year you sold in New York,

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1 A. So, you asked me about year 2014. So, are
2 you asking me if I received one in 2014 as well or the
3 same one or --

4 Q. I'm asking when you first heard of an entity
5 known as Sam Yang USA. And then I also asked you when
6 you first heard of an entity named SC Continent
7 Corporation. Your testimony was the first time you
8 heard about either of those entities was when you
9 received a letter about them, right? Do you remember
10 that testimony?

11 A. Yes, I remember.

12 Q. And I asked about when you received that
13 letter. And your testimony was you think you received
14 this letter in 2007 or 2008 or something like that.
15 Remember that testimony?

16 A. Yes.

17 Q. Your best recollection is you received this
18 letter from SC Continent or Sam Yang USA in 2007 or
19 2008?

20 A. Yes.

21 Q. And that letter was directed to whom?

22 A. I believe it was directed to the company
23 Seohae USA.

24 Q. To your attention at Seohae?

25 A. So, I received it.

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1 Q. Okay. And remember, we're talking about
2 specifically this purported 2007, 2008 letter, okay?
3 Is that fair?

4 A. Yes.

5 Q. So, we know generally the date, but you
6 don't know if it was on like a lawyer's letterhead or
7 SC Sam Yang USA's letterhead or anything like that,
8 right?

9 MS. CHOI: Objection. Asked and answered.
10 Go ahead and answer.

11 A. Yes, I do not recall. No, I do not recall.

12 Q. When's the last time you saw that letter?

13 A. Because I saw it once and that was it. So,
14 it would be 2007 or 2008, I think.

15 Q. What do you recall the letter saying?

16 MS. CHOI: Objection. Asked and answered.
17 Please go ahead and answer.

18 A. As I said earlier, I believe it talked about
19 stopping the sales.

20 Q. Of what?

21 A. Samyang products.

22 Q. Stopping sales of Samyang products in any
23 particular geographic region?

24 A. I do not recall that much. But about the
25 region -- the region -- about the region, I don't think

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1 there was any mentioning about the region there.

2 Q. Did this purported letter say anything about
3 why you should stop selling Samyang Korea products?

4 MS. CHOI: Objection. Speculation. But if
5 you know the answer, please.

6 A. Probably at the time, based on what I can
7 recall, even though I don't have no exact recollection
8 about it. But as a matter of fact, I only --
9 seriously, I only remember the word not to sell.
10 That's what I remember.

11 Q. And to be clear, so we can maybe eliminate
12 the speculation objections, when this letter came in,
13 you read it, correct?

14 A. Yes, that's correct.

15 Q. So, you may or may not have a distinct
16 memory of what it said ten years later, but it's
17 something you read, so you're not guessing or
18 speculating about what might have been in it, correct?

19 A. Yes, that's correct.

20 Q. So, all you recall about this letter is that
21 it said something about stopping selling Samyang Korea
22 products?

23 A. Yes.

24 Q. How many pages was the letter?

25 A. I am thinking it was probably one page.

1 ahead.

2 MR. MCDONOUGH: Because I didn't ask about
3 an exhibit. You're the one who asked about an exhibit.

4 MS. CHOI: Now that's a proper question.
5 Okay. Objection. Asked and answered, but go ahead and
6 answer.

7 A. As a matter of fact, I do not recall. But
8 the reason why I do not recall that is -- well, at the
9 time, I myself wanted to know why that was sent to me.
10 But then I was selling -- I was doing the sales and
11 then this kind of letter came. But then after that,
12 there was no follow-up contacts and no additional
13 contacts. Except for this particular letter, there
14 were no other actions, like no telephone calls, no
15 nothing. There was no phone call telling us to stop
16 selling them either.

17 So, after I received the letter, for about
18 one month I was like wondering about why I got the
19 letter. But there was no follow-ups. There was no
20 problems. Therefore, I started selling Samyang ramen
21 products again.

22 Q. A couple of basic questions. Upon receipt
23 of that letter, did you, sir, make any effort to reach
24 out to the writer of that letter?

25 MS. CHOI: Objection. We're talking about

1 A. 14 days the shipment. Meaning, 14 days
2 after the shipment, it needs to be sent. That's what
3 that means.

4 Q. 14 days after the shipment is received at
5 the identified port?

6 A. After the shipment has left port of Busan,
7 14 days after that it needs to be sent. That's what
8 that means.

9 Q. Thank you.

10 MS. CHOI: For clarification purposes, when
11 he says "it," does he mean payment or does he mean the
12 products?

13 MR. MCDONOUGH: In what context?

14 MS. CHOI: When he was testifying 14 days,
15 he stated that it was after it leaves Busan, then 14
16 days it must be sent. "It." I needed to know what
17 that meant. Products or payment?

18 THE WITNESS: Payment with the money.

19 (Lee Exhibit 163 was marked for purposes of
20 identification.)

21 Q. Sir, Exhibit 163 is an ENI sales plan and
22 strategy document. Have you seen this before?

23 A. Yes.

24 Q. Who prepared this document?

25 A. Myself and my employees.

1 Q. And I have one more question on that point.
2 Did Samyang Korea provide you with any of the
3 information included within Exhibit 163?

4 MS. CHOI: Objection. Asked and answered.
5 Go ahead.

6 A. No.

7 Q. Let's go to page 196. Well, let's go to 195
8 first. See Roman numeral six, "Sales Strategies in the
9 East"?

10 A. Yes.

11 Q. Number 3. "Market Issue in the East." See
12 that?

13 A. Yes.

14 Q. What was that market issue?

15 A. May I look at the pages in the back?

16 Q. I guess. Let us know what page number
17 you're on, sir.

18 A. 202.

19 Q. 202. Okay.

20 A. So, may I just go ahead and explain?

21 Q. Sure. The question is, Roman numeral six,
22 item 3 on page 195, what is the market issue in the
23 East to which you are referring?

24 A. Yes. May I?

25 Q. That's why I asked it. Please.

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1 A. If you look at this chapter, it talks about
2 the market issues in the East Coast. First of all,
3 other competitors, other ramen competitors, are doing
4 some kind of event. So, let's increase what we do in
5 terms of those event-like activities more than what we
6 are doing currently.

7 In relation with a newspaper, you know, the
8 paper space in a newspaper and radio advertisement,
9 let's put in a request to Jin Heung. That's what it's
10 about. Marketing strategy for the seasonal products is
11 lacking. Therefore, manufacturers and ENI need to
12 discuss the marketing strategies. It's needed.

13 So, the consumer price of SC, the company,
14 SC's products are higher than the prices of the
15 competitors. There is that awareness. Therefore,
16 continuous promotion regarding SC products' price is
17 necessary. So, what it means by that is at that time
18 in 2016 -- I think we talked about this like around
19 fall --- that the products that SC was selling in the
20 East Coast and in the West Coast. But the SC products,
21 we did not sell the products that SC was selling.
22 Anyhow, the prices -- the consumer prices were high in
23 the grocery store. Therefore, the promotion would be
24 necessary. That's what it means.

25 Q. Who's SC?

EXHIBIT 24



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Transcript of Sae Hyuk Han, Designated Representative

Date: January 24, 2017

Case: Sam Yang (U.S.A), Inc., et al. -v- Samyang Foods Co., Ltd.

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Transcript of Sae Hyuk Han, Designated Representative

Conducted on January 24, 2017

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1 Q How does Samyang Korea advertise its products 15:17:55
2 for sale in Korea? 15:17:59

3 A Well, it is being done through many various 15:18:25
4 methods, and I believe that it is being done through SNS 15:18:29
5 recently. 15:18:38

6 Q How much does Samyang Korea spend on 15:18:39
7 advertising and marketing its products in Korea 15:18:43
8 annually? 15:18:46

9 A About the exact amount of that, I am not sure. 15:19:04

10 Q Where can I find that information? 15:19:07

11 A Well, through finance department or accounting 15:19:26
12 department of the company, perhaps you can find that 15:19:32
13 information. 15:19:35

14 Q Does Samyang Korea advertise its products for 15:19:36
15 sale in the U.S.? 15:19:39

16 A It does not do it directly. 15:19:53

17 Q Does it do it indirectly? 15:19:58

18 A I believe that it is what the distributor in 15:20:07
19 America needs to do. 15:20:15

20 Q Does Samyang Korea provide support to 15:20:19
21 distributors in the U.S. for advertising and marketing? 15:20:23

22 A Basically, we give them the price that is low, 15:21:19
23 the price itself is low, so the importer or the 15:21:28
24 distributor, they sell the products having the marketing 15:21:32
25 cost included. And if and when other business clients 15:21:38

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Transcript of Sae Hyuk Han, Designated Representative

Conducted on January 24, 2017

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1	of ours, when they made the reasonable request, we did	15:21:49
2	review and we have provided additional support. We have	15:21:58
3	done that.	15:22:04
4	Q To what distributors have you provided	15:22:06
5	additional support?	15:22:08
6	A Well, it would depend on the circumstances.	15:22:55
7	When a particular business client -- it's hard for me to	15:23:00
8	just point out a particular client for that matter. But	15:23:12
9	anyway, when the request is made, we review that, and	15:23:15
10	when the cost is reasonable, we may support that	15:23:20
11	particular cost or we might go 50-50. In that kind of	15:23:25
12	matter, we do provide the support. That applies to	15:23:34
13	SYUSA as well, the same way.	15:23:45
14	Q Has Samyang Korea provided marketing support	15:23:53
15	or advertising support to Jin Heung?	15:23:58
16	A Something in particular? No. The support has	15:24:19
17	not been provided.	15:24:24
18	Q How about to ENI?	15:24:27
19	A The same thing for ENI. Those companies would	15:25:00
20	have the understanding, probably, that the price itself	15:25:07
21	is low, that the marketing support is included in the	15:25:14
22	price. That would be the understanding.	15:25:23
23	Q Has Samyang Korea sold the same products to	15:25:28
24	distributors in the U.S. at different prices?	15:25:35
25	A About the price, about the price difference,	15:26:02

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Transcript of Sae Hyuk Han, Designated Representative

Conducted on January 24, 2017

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1	right now I cannot recall the exact details about it.	15:26:07
2	But what I do remember for sure is that SYUSA received	15:26:27
3	the products for the lowest possible price.	15:26:37
4	Q What trademarks has Samyang Korea registered	15:26:46
5	or applied to register in the U.S.?	15:26:51
6	A Samyang Korea's trademarks -- of course	15:27:15
7	Samyang Foods' trademarks are registered in the U.S.A.	15:27:25
8	Q Which trademarks?	15:27:32
9	MR. RHOW: That's vague.	15:27:37
10	You can answer.	15:27:40
11	A Yes. It's Samyang's logo, and it has the	15:27:42
12	pattern of a tree, and then it has the English alphabet	15:28:03
13	of S-A-M-Y-A-N-G. I do recall that it has been	15:28:07
14	registered with that.	15:28:12
15	Q Have these trademarks been assigned to Sam	15:28:16
16	Yang USA?	15:28:20
17	MR. RHOW: Vague as to "assigned." Calls for	15:28:30
18	a legal conclusion.	15:28:35
19	But you can answer.	15:28:35
20	A Do I have to answer?	15:28:55
21	MR. RHOW: Yes, please. Sorry, you should	15:28:57
22	answer.	15:28:59
23	A I'm sorry. The word "assigned" has been on my	15:29:08
24	mind, so I forgot the question.	15:29:16
25	Q Has Samyang North [sic] Korea assigned its	15:29:18

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Transcript of Sae Hyuk Han, Designated Representative

Conducted on January 24, 2017

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C E R T I F I C A T E

I, Lisa V. Feissner, RDR, CRR, CLR, do hereby certify that the witness was first duly sworn by me pursuant to stipulation of counsel and that I was authorized to and did report said proceedings.

I further certify that the foregoing transcript is a true and correct record of the proceedings; that said proceedings were taken by me stenographically and thereafter reduced to typewriting under my supervision; that reading and signing was not requested; and that I am neither attorney nor counsel for, nor related to or employed by, any of the parties to the action in which this deposition was taken; and that I have no interest, financial or otherwise, in this case.

IN WITNESS WHEREOF, I have hereunto set my hand this 28th day of January, 2017.



Lisa V. Feissner, RDR, CRR, CLR

EXHIBIT 25



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Transcript of Bong Hoon Kim

Date: January 26, 2017

Case: Sam Yang (U.S.A), Inc., et al. -v- Samyang Foods Co., Ltd.

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Transcript of Bong Hoon Kim
Conducted on January 26, 2017

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1	speaking it's a joint venture or not, but the investment	10:39:33
2	was done 50-50.	10:39:36
3	Q How long have you worked for Samyang Baker	10:39:39
4	Tank Terminal?	10:39:42
5	A March. So right now it's January. So it's	10:40:00
6	been ten months.	10:40:03
7	Q And where did you work before that?	10:40:04
8	A I worked at Samyang Korea.	10:40:10
9	Q What is your current job title?	10:40:17
10	A CEO.	10:40:22
11	Q And what was your job title when you worked at	10:40:27
12	Samyang Korea?	10:40:30
13	A I was a managing director.	10:40:40
14	Q When did you start working for Samyang Korea?	10:40:47
15	A I started working for the company on	10:41:02
16	December the 12th of 1987.	10:41:04
17	Q When you were a managing director at Samyang	10:41:11
18	Korea, what department were you in?	10:41:16
19	A I was a sales department head, and then --	10:41:30
20	yeah, I was the department head of the sales department.	10:41:36
21	And then on the side, I was also the department head for	10:41:39
22	the milk processing department. And also on the side, I	10:42:00
23	was the department head for soy sauce -- you know, the	10:42:07
24	soy sauce, I was the department head for that department	10:42:11
25	as well. And I was also department head of the	10:42:13

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CONFIDENTIALTranscript of Bong Hoon Kim
Conducted on January 26, 2017

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1 something different. So maybe I'm the only one who has 12:15:13
2 the wrong copy. The Bates number on the stamped one, 12:15:19
3 Erik, it's 1269. And then this is 1268 in this copy. 12:15:22
4 Mine is 1270 in my copy. It's not a big deal. It seems 12:15:34
5 like a copying issue. But what's odd, though -- that's 12:15:38
6 why I think there could be some confusion. I'm 12:15:42
7 predicting 1268 is the second page of a different 12:15:45
8 letter. So when he testified he could only recognize 12:15:49
9 the second page, he was actually right. This is the 12:15:53
10 version I have (handing). 12:15:58

11 MR. von ZEIPPEL: Let's go off the record real 12:16:02
12 quick. 12:16:04

13 VIDEO OPERATOR: We are now going off the 12:16:05
14 video record. The time is 12:16. 12:16:08

15 (Recess from 12:16 p.m. until 1:45 p.m.) 13:45:37

16 VIDEO OPERATOR: We are now going back on the 13:45:37
17 video record. The time is 1:45. 13:45:41

18 Q Sir, we're back on the record. You understand 13:45:44
19 that you're still under oath? 13:45:46

20 A Yes. 13:45:52

21 (Exhibit BH Kim-101 marked for identification 13:45:53
22 and attached to the transcript.) 13:46:09

23 MR. RHOW: So this is 101 now? Got it. 13:46:09

24 Q Sir, you've been handed what the court 13:46:11
25 reporter has marked as Exhibit 101. Have you ever seen 13:46:13

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Transcript of Bong Hoon Kim
Conducted on January 26, 2017

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1	this document before?	13:46:15
2	A Yes.	13:46:35
3	Q And what is this document?	13:46:35
4	A Upon hearing that Sam Yang USA was going to	13:46:55
5	sell its shares, I believe we sent our answer. It looks	13:47:01
6	like this is that.	13:47:10
7	Q How did you hear that Sam Yang USA was going	13:47:13
8	to sell its shares?	13:47:16
9	A How did I hear about that? What do you mean	13:47:37
10	by that exactly?	13:47:40
11	Q Who did you hear it from that Sam Yang USA was	13:47:43
12	going to sell its shares?	13:47:45
13	A I believe I heard it from a staff member.	13:47:59
14	Q What staff member?	13:48:05
15	A That I do not remember exactly, but I believe	13:48:12
16	I heard about it from a staff member who worked at	13:48:15
17	overseas sales team.	13:48:27
18	Q Did you draft this letter?	13:48:28
19	A No. Yes. I mean, I did not prepare this.	13:48:36
20	Q Who prepared the letter?	13:48:50
21	A A staff member, probably a staff member who	13:48:59
22	worked at overseas sales team wrote this.	13:49:02
23	Q Who instructed that staff member to write this	13:49:06
24	letter?	13:49:09
25	A I probably have done that.	13:49:22

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Transcript of Bong Hoon Kim
Conducted on January 26, 2017

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1 outstanding balance becomes bigger, I was thinking that 14:44:47
2 any company would demand the payments. I thought that 14:44:54
3 was possible. So that's the reason why I talked to the 14:45:00
4 staff member strongly about it. That I do remember. 14:45:05

5 Q Did Samyang Korea ever demand payment on the 14:45:31
6 accounts receivable from Sam Yang USA before shipping 14:45:37
7 products to Sam Yang USA? 14:45:41

8 MR. RHOW: Speculation, vague. 14:46:01

9 You can answer. 14:46:03

10 A Here, except for the U.S.A., all other 14:46:31
11 companies, once the money comes in, when the LC is 14:46:38
12 opened, the product would go out. And so that has to 14:46:46
13 come in. So only after that, the product will go out. 14:46:58
14 I'm talking about other overseas business clients. 14:47:02

15 Q Did you ever have any conversations with any 14:47:11
16 of your superiors regarding Sam Yang USA's accounts 14:47:14
17 receivable? And by that I mean, accounts receivable 14:47:22
18 from Sam Yang USA to Samyang Korea. 14:47:40

19 A So having some conversations with somebody? 14:48:02
20 What do you mean by that? 14:48:04

21 Q Did you ever have any conversations with any 14:48:06
22 of your superiors regarding accounts receivable from Sam 14:48:08
23 Yang USA to Samyang Korea? 14:48:14

24 A No. Actually, rather than that, based on what 14:48:56
25 I can recall, to America, to United States, I wanted to 14:48:59

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Transcript of Bong Hoon Kim
Conducted on January 26, 2017

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1	with -- bearing my name, so I'm thinking that something	15:04:57
2	like this must have happened.	15:05:02
3	Q This is a letter from you to Sam Yang USA,	15:05:11
4	correct?	15:05:14
5	A Yes, it seems like it, yes.	15:05:26
6	Q What is the subject of this letter?	15:05:29
7	A Year 2012, a suggestions for the normalization	15:05:45
8	of the business transactions.	15:05:53
9	Q Who drafted this letter?	15:06:00
10	A It's not me.	15:06:12
11	Q Did you instruct someone about the contents of	15:06:12
12	this letter before it was drafted?	15:06:17
13	A Yes. I must have.	15:06:29
14	Q Who did you instruct?	15:06:34
15	A It seems like I did that to Gong Wook Kim, the	15:06:42
16	manager.	15:06:47
17	Q In this letter, you make reference to, if the	15:07:02
18	restoration of the price and payment terms is delayed	15:07:06
19	any further, we would reach a point that we would have	15:07:09
20	no options but stopping the export to America	15:07:13
21	altogether.	15:07:17
22	Do you see that?	15:07:17
23	A Yes.	15:07:57
24	Q What did you mean by that?	15:07:58
25	A Okay. For Sam Yang USA, compared to other	15:08:45

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Transcript of Bong Hoon Kim
Conducted on January 26, 2017

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1 business clients, the price is lower for Sam Yang USA. 15:08:53
2 And even about the payment terms, we give them 90 days. 15:08:59
3 And even when we were doing this kind of things for 15:09:06
4 them -- what I mean by that is, with other business 15:09:12
5 clients, our product would go out if and when the 15:09:18
6 deposit is made. But with Sam Yang USA, they did not 15:09:22
7 pay the unbalanced [sic] account receivable, and the 15:09:30
8 sales volume did not increase, so that's why. 15:09:35

9 And then, if you look at it here, it states 15:10:01
10 that, you have continuously delayed this company's 15:10:05
11 request by utilizing the special relationship status. 15:10:15
12 So when it says "special relationship," that means the 15:10:32
13 person being the daughter of the chairperson. I might 15:10:38
14 say royal family. And that's the reason why we have 15:10:44
15 continued doing this, like giving them a break. 15:10:59

16 However, the sales amount did not increase, 15:11:22
17 but then, unpaid balance became larger, so I believe at 15:11:28
18 that time we or I suggest that, let's have the unpaid 15:11:37
19 outstanding balance reduced first. 15:11:52

20 If I may add some additional explanation to 15:12:01
21 that. If I, like, go strongly like this -- how do I say 15:12:04
22 this? Well, I might get fired or something from the 15:12:18
23 company. So I was taking my chance of that, and I 15:12:21
24 proceeded like this. 15:12:33

25 Q Was there ever a time when Sam Yang USA did 15:12:39

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Transcript of Bong Hoon Kim
Conducted on January 26, 2017


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C E R T I F I C A T E

I, Lisa V. Feissner, RDR, CRR, CLR, do hereby
certify that the witness was first duly sworn by me
pursuant to stipulation of counsel and that I was
authorized to and did report said proceedings.

I further certify that the foregoing
transcript is a true and correct record of the
proceedings; that said proceedings were taken by me
stenographically and thereafter reduced to typewriting
under my supervision; that reading and signing was not
requested; and that I am neither attorney nor counsel
for, nor related to or employed by, any of the parties
to the action in which this deposition was taken; and
that I have no interest, financial or otherwise, in this
case.

IN WITNESS WHEREOF, I have hereunto set my
hand this 29th day of January, 2017.



Lisa V. Feissner, RDR, CRR, CLR

EXHIBIT 26

Samyang Foods Co., Ltd.

Address: 82-9, Hawolgok 1-dong, Songbuk-gu, Seoul, 136-131, Republic of Korea
Home Page : <http://www.samyangfood.co.kr>
E-mail : gongwook@hotmail.com
Telephone : +82-2-940-3340~4, 940-3292
Facsimile : +82-2-919-6180

TO: S. C. CONTINENT CORPORATION

Date: FEB. 27, 2012.

Attn: Mun Kyoung Chun, President; See Young Lee, Director; Woon Bae Yeo, Department Head

Total page(s): 2

From: Overseas Sales Team

including this covering

Subject: Our company's position regarding adjustment of when to start the price increase and change of the payment terms in 2012

I wish your company all the best.

We are deeply grateful that you have accepted our company's suggestions for normalization of the business in 2012.

Based on your company's official letters dated 2.13.2012 and 2.23.2012, the changes with the payment terms were accepted; however, as you have requested some discussion about the price and the procedure for the grace period, with the respect for your company's opinion, our company would like to apply the grace period to the price hereafter like below; please let us know what your company's thoughts are.

- 1) Price: Our company has increased the price as of August 1st 2011 like the attachment. However, the export price with your company, the increased portion in 2010, was supposed to be implemented as of January 1st, 2011; however, during the discussion, the 3-month-grace period was applied and it was applicable as of April 1st 2011; therefore, the increased portion as of August 1st 2011 was scheduled to be increased as of January 1st 2012 with our company's official letter dated 11.29.2011. However, with this request on your company's official letter dated 2.23.2012, as for the price increase, we would like to increase the price from \$6.60 to \$7.60 as of April 1st, 2012 for Samyang Ramen (120g) like the attachment. (The existing price is applicable up to the order as of March 31st 2012.)
- 2) Please refer to the attachment for the increased price and increase rate per item.
(The causes for the price increase: drop in exchange rate 5%, rise in costs 6% [circled], payroll increase 2%, increase in maintenance cost 2%)
- 3) The payment terms: When the agreement is reached on the price increase and the timing of it, a modified *PRO-FORMA INVOICE* will be sent out again, when the payment is processed, production will be done immediately and then it will be shipped out. Thank you.

Sincerely, Bong Hoon Kim/ Gong Ook Kim

Samyang Foods, Sales Department Head / Overseas Sales Team Leader (deputy)

cc

SAMYANG FOODS, a Ramen Manufacturer with a proud history of 40 years' tradition based on Honesty and Credit.

Internal 021

S. C. Price Increase in 2012

When the price is to be increased: 01.01.2012

Request for the grace period—02.23.2012
Applicable with the orders as of 04.01.2012

Samyang Brand's export price (Noodles in a bag)

Item	# of PKGS	Existing price	Increased price	Increase rate	Note
Samyang Ramen	120gX20	\$6.60	\$7.60	15.15%	For Multi, X2
Kimchi Ramen	120gX20	\$6.50	\$7.20	10.77%	
Samyang Ramen Spicy Flavor (Yukgaejang)	120gX20	\$6.60	\$7.20	9.09%	
U-dong	120gX20	\$6.50	\$7.20	10.77%	
Beef Flavor Ramen	120gX20	\$6.50	\$7.20	10.77%	
Bajirak Kalgugsu	100gX20	\$6.90	\$7.20	4.35%	
Chacharoni	140gX20	\$7.50	\$7.50	0.00%	
Sutah Ramen	120gX20	\$7.60	\$7.60	0.00%	
Seafood Party	125gX20	\$7.80	\$7.80	0.00%	
Assorted Vegetable Ramen	115gX40	\$18.60	\$19.50	4.84%	

Samyang Brand's export price (Cup Ramen)

Item	# of PKGS	Existing price	Increased price	Increase rate	Note
Kimchi Ramen	86gX12	\$4.90	\$5.20	6.12%	
Yukgaejang	86gX12	\$4.90	\$5.20	6.12%	
Samyang Cup Ramen	65gX12	\$4.50	\$4.80	6.67%	
Samyang Big Bowl noodle Soup	115gX16	\$9.00	\$9.00	0.00%	

Samyang Brand's export price (Snack)

Item	# of PKGS	Existing price	Increased price	Increase rate	Note
Chang Gu	75gX30	\$8.60	\$9.90	15.12%	
Wang Chang Gu	240gX10	\$9.30	\$9.90	6.45%	
Corn Snack	45gX30	\$8.60	\$9.90	15.12%	
Topokki Snack	75gX30	\$9.00	\$9.90	10.00%	
Star Popeye	65gX30	\$6.30	\$6.30	0.00%	

Samyang Foods Co., Ltd.

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Telephone : +82-2-940-3340~4, 940-3202

Facsimile : +82-2-919-6180

To : S.C CONTINENT CORPORATION

Date : FEB. 27, 2012.

Attn. : 전문경 사장님, 이시영 상무님, 여운배 부장님

Total page(s) : 2

From : 해외영업팀

Including this covering

Subject : 2012 년 가격인상 시기 조율 및 결제 조건 변경에 대한 당사의 입장

귀사의 원의 변창하심을 기원드립니다.

당사의 2012 년 거래정상화를 위한 제안을 수용해 주신 점 깊이 감사드립니다.

귀사의 2012.2.13 일자, 2012.2.23 일자 공문에 의거 결제 조건 변경은 수용하나, 가격 부분에 대한 협의 및 유예 절차등 요청에 오신바, 당사에서는 귀사의 의견을 존중 아래와 같이 향후 가격부분에 대해서 유예 진행코자 하오니 귀사의 의견을 주시기 바랍니다.

1) 가격 : 당사는 2011 년 8 월 1 일자로 첨부와 같이 가격을 인상하였습니다. 하지만 귀사의 수출가격은 2010 년 인상이 2011 년 1 월 1 일부터 시행되기로 되었었으나, 협의 과정에서 3 개월 유예한 2011 년 4 월 1 일부터 적용된바, 2011 년 8 월 1 일 인상을 당사의 2011.11.29 일자 공문으로 2012 년 1 월 1 일부터 인상할 예정이었습니다. 하지만, 귀사의 금번 2012.2.23 일자 공문 요청으로 가격인상을 2012 년 4 월 1 일자로 첨부와 같이 삼양라면(120g)을 \$6.80 에서 \$7.60 인상코자 합니다. (2012 년 3 월 31 일자 발주까지 기존가격 적용)

2) 품목별 가격인상액과 읊은 첨부 참조 바랍니다.

(가격인상 요인: 환율하락 5%, 원가상승 6%, 금여인상 2% 관리비 상승 2%)

3) 결제 조건 : 가격인상 및 시기에 대해 합의를 하시면 수정된 PRO-FORMA INVOICE 를 다시 발송하고, 결제가 진행되면 바로 생산하여 선적토록 하겠습니다.

감사합니다.

김봉준 / 김공욱 배상

삼양식품 영업본부장 / 해외영업팀장(대)

cc

SAMYANG FOODS, a Ramen Manufacturer with a proud history of 40 years' tradition based on Honesty and Credit.

FEB-28-2012 10:55PM From:

ID:

EXHIBIT

depoobok.com

BH Kim-106
LVF 01-26-17

SY001315

2012년 S.C 가격인상

인상시기 : 2012.01.01 유예요청-2012.02.23
2012.04.01. 발주분부터 적용

삼양 브랜드 수출가(봉지면)

품목	입수	기존가	인상가	인상율	비고
삼양라면	120gX20	\$6.60	\$7.60	15.15%	델타는 x 2
김치라면	120gX20	\$6.50	\$7.20	10.77%	
삼양라면 매운맛(육개장)	120gX20	\$6.60	\$7.20	9.09%	
우동	120gX20	\$6.50	\$7.20	10.77%	
소고기면	120gX20	\$6.50	\$7.20	10.77%	
바지락칼국수	100gX20	\$6.90	\$7.20	4.35%	
짜짜로니	140gX20	\$7.50	\$7.50	0.00%	
수타면	120gX20	\$7.60	\$7.60	0.00%	
해물파티	125gX20	\$7.80	\$7.80	0.00%	
맛있는 라면	115gX40	\$18.60	\$19.50	4.84%	

삼양 브랜드 수출가(컵라면)

품목	입수	기존가	인상가	인상율	비고
김치라면	86gX12	\$4.90	\$5.20	6.12%	
육개장	86gX12	\$4.90	\$5.20	6.12%	
삼양컵라면	65gX12	\$4.50	\$4.80	6.67%	
삼양큰컵	115gX16	\$9.00	\$9.00	0.00%	

삼양 브랜드 수출가(스낵)

품목	입수	기존가	인상가	인상율	비고
짬구	75gX30	\$8.60	\$9.90	15.12%	
왕짬구	240gX10	\$9.30	\$9.90	6.45%	
사또밥	45gX30	\$8.60	\$9.90	15.12%	
떡볶이 스낵	75gX30	\$9.00	\$9.90	10.00%	
별뿔빠이	65gX30	\$6.30	\$6.30	0.00%	

EXHIBIT 27



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Transcript of Bonghoon Kim - Volume 2

Date: July 6, 2017

Case: Sam Yang (U.S.A), Inc., et al. -v- Samyang Foods Co., Ltd.

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Transcript of Bonghoon Kim - Volume 2

Conducted on July 6, 2017

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1 A I don't recall that there was any 15:24:15
2 particularly big problems. 15:24:18

3 Q Did you ever feel that you had to treat 15:24:23
4 that company differently than any other company with 15:24:25
5 whom Samyang Korea dealt? 15:24:28

6 A When you say "treated them differently," 15:24:53
7 what do you mean? 15:24:56

8 Q Differently than some other company. They 15:24:58
9 got favorable sales terms, or... 15:25:03

10 A Yes. Yes, we did treat them favorably. 15:25:13

11 Q There you go. In what respect did you 15:25:17
12 treat them favorably? 15:25:22

13 A The price was set at a lower price. 15:25:38

14 Q Who set that price? 15:25:41

15 A I probably did it. 15:25:50

16 Q Why did you set that price low for this 15:25:52
17 particular entity? 15:25:55

18 A That is because it was the daughter of the 15:26:09
19 new deceased honorable Chairman. 15:26:12

20 Q Did the honorable Chairman ever instruct 15:26:14
21 you to treat his daughter's company differently than 15:26:17
22 any other company with whom Samyang Korea engaged? 15:26:22

23 A No. He wasn't that specific. However, he 15:26:50
24 did say treat it well. 15:26:54

25 Q Do you have any understanding what he 15:26:58

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Transcript of Bonghoon Kim - Volume 2

Conducted on July 6, 2017

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1 meant when he suggested to you that you should treat 15:27:00
2 his daughter's company well? 15:27:02

3 A Well, what I took that as is that when it 15:27:28
4 comes to support, and whatnot, differentiated from 15:27:32
5 other companies. 15:27:38

6 Q How did you guys do that? 15:27:39

7 A As I told you before, we provided price 15:27:58
8 that were lower than other business partners; and I 15:28:03
9 seemed to recall that we supported, somewhat, in 15:28:07
10 marketing. 15:28:12

11 Q What do you recall in terms of supporting 15:28:14
12 that company in marketing? What sorts of things did 15:28:18
13 you guys do? 15:28:23

14 A To my recollection, at the time, it was 15:28:35
15 provided on a container basis. For example, certain 15:28:38
16 amount above and beyond the container. 15:28:44

17 Q Sir, notwithstanding that Samyang Korea 15:28:55
18 provided prices that were lower than other business 15:28:58
19 partners, generally, still able to turn a profit on 15:29:01
20 your business with Sam Yang (USA). Correct? 15:29:05

21 A That, I don't know. 15:29:30

22 Q Sir, when did you leave Samyang Korea? 15:29:31

23 A January 14th 2016. 15:29:42

24 WITNESS: [Korean spoken] 15:29:48

25 INTERPRETER: Oh. 15:29:48

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Transcript of Bonghoon Kim - Volume 2

Conducted on July 6, 2017

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1	A	Actually, March 14th 2016.	15:29:48
2	Q	Were you involved, Sir, in any internal	15:29:59
3		discussions or communications regarding terminating	15:30:04
4		an agreement between Samyang Korea and Sam Yang	15:30:09
5		(USA)?	15:30:12
6	A	No.	15:30:35
7	Q	Sir, how many times in your career at	15:30:36
8		Samyang Korea did you discuss with the former	15:30:39
9		Chairman, anything having to do with his daughter's	15:30:42
10		company?	15:30:46
11	A	Between the now deceased honorary Chairman	15:31:13
12		and I, we weren't in a position where I held	15:31:19
13		discussions with him. I was in a position where he	15:31:23
14		instructed. And, to my recollection, he said that	15:31:26
15		one thing, that one time, as I told you.	15:31:32
16	Q	When did he tell you that one thing that	15:31:35
17		one time?	15:31:38
18	A	It's been a long time, so I don't remember	15:31:47
19		when that was.	15:31:50
20	Q	Did the honorary former Chairman ever	15:31:50
21		express to you any displeasure with how his daughter	15:31:53
22		treated him in their business dealings?	15:32:00
23	A	No. Because I couldn't see him.	15:32:21
24	Q	How often did you interact with him when	15:32:27
25		you were at Samyang Korea?	15:32:29

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Transcript of Bonghoon Kim - Volume 2

Conducted on July 6, 2017

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1	A	Almost none. Maybe once or twice a year.	15:32:49
2		Whenever I saw the Chairman, I couldn't even look at	15:33:00
3		his eyes. I couldn't see his face directly.	15:33:03
4	Q	Why not?	15:33:08
5	A	Because I was scared of him.	15:33:11
6	Q	Why were you scared of him?	15:33:14
7	A	You are just supposed to be scared of him	15:33:21
8		like that.	15:33:23
9	Q	Fair enough.	15:33:26
10	A	He was like the king.	15:33:30
11	Q	I'm actually a little bit curious about	15:33:35
12		this, so bear with me and then I'll turn to some of	15:33:37
13		the documents, and maybe it will jog your memory.	15:33:41
14		All right?	15:33:44
15		Was he an intimidating person?	15:33:48
16	A	No, that's not it.	15:33:55
17	Q	Was he a -- did you consider him to be a	15:33:57
18		good businessman?	15:34:01
19	A	Yes.	15:34:09
20	Q	Disciplined man?	15:34:10
21	A	Yes.	15:34:14
22	Q	Someone who people probably couldn't take	15:34:20
23		advantage of?	15:34:23
24	A	Correct.	15:34:29
25	Q	Tough guy?	15:34:32

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Transcript of Bonghoon Kim - Volume 2

Conducted on July 6, 2017

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1	A	When you say "tough," what do you mean?	15:34:38
2	Q	Well, just intimidating; imposing;	15:34:41
3		difficult. Any of those sorts of things that made	15:34:44
4		other businesspeople wary of him.	15:34:48
5	A	As far as I remember our honorary	15:35:42
6		Chairman, I remember him as someone who's very	15:35:46
7		logical and reasonable, and someone who was very	15:35:49
8		frugal. So, all of the employees respected him.	15:35:56
9		So, he held a force that required reverence.	15:36:06
10	Q	Thank you. He treated people well?	15:36:23
11	A	Yes.	15:36:29
12	Q	And he treated his employees well and was	15:36:30
13		respectful of them?	15:36:33
14	A	Yes. Can I give you an example?	15:36:40
15	Q	I'd love one, thank you.	15:36:43
16	A	Well, one of the examples was that at one	15:37:21
17		time in my career in the company, there was a period	15:37:23
18		of time where I spent every night at the company for	15:37:27
19		some six months period.	15:37:31
20		And, one night, accidentally, I got on to	15:37:33
21		the elevator with the Chairman, and, you know, we	15:37:38
22		should not have been riding the elevator together,	15:37:45
23		but I just happened to be riding with him. And he	15:37:48
24		told me, "You are a young man, so you should really	15:37:54
25		think of your health when you work."	15:37:57

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Transcript of Bonghoon Kim - Volume 2

Conducted on July 6, 2017

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C E R T I F I C A T E

I, Giselle M. Mitchell, RPR, CRI, do hereby certify that the witness was first duly sworn by me pursuant to stipulation of counsel and that I was authorized to and did report said proceedings.

I further certify that the foregoing transcript is a true and correct record of the proceedings; that said proceedings were taken by me stenographically and thereafter reduced to typewriting under my supervision; that reading and signing was not requested; and that I am neither attorney nor counsel for, nor related to or employed by, any of the parties to the action in which this deposition was taken; and that I have no interest, financial or otherwise, in this case.

IN WITNESS WHEREOF, I have hereunto set my hand this 17th day of July, 2017.



GISELLE M. MITCHELL, RPR, CRI

EXHIBIT 28



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Transcript of Seunghyun Kim - Volume 2

Date: July 6, 2017

Case: Sam Yang (U.S.A), Inc., et al. -v- Samyang Foods Co., Ltd.

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Transcript of Seunghyun Kim - Volume 2

Conducted on July 6, 2017

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1	A	With the retail stores.	11:10:07
2	Q	What do these end caps look like? Please	11:10:08
3		describe?	11:10:12
4	A	Okay. You want me to show you in	11:10:13
5		pictures?	11:10:16
6		MR. RHOW: No. Just describe it.	11:10:17
7		THE WITNESS: That will be a display	11:10:42
8		section that is at the end of each shelving --	11:10:44
9		INTERPRETER: Strike that.	11:10:52
10	A	I am talking about a location at the	11:10:54
11		beginning of the shelf where you can have a logo,	11:10:56
12		and having only your product displayed, so the	11:11:00
13		consumer can see your brand and your product right	11:11:06
14		away in the beginning of the ramen section.	11:11:10
15	Q	These tasting events you've identified,	11:11:16
16		does Samyang Korea provide any financial support to	11:11:19
17		ENI for the hosting of these events?	11:11:22
18	A	Yes. For a portion of it. Yes.	11:11:31
19	Q	Is there any sort of set amount that you	11:11:40
20		guys pay?	11:11:43
21	A	Well, the expense that is required to run	11:12:19
22		these tasting events. For example, usually, this	11:12:25
23		tasting goes on three days, encompassing the	11:12:31
24		weekend -- Friday, Saturday and Sunday.	11:12:37
25		And, in order to have someone manning the	11:12:40

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Transcript of Seunghyun Kim - Volume 2

Conducted on July 6, 2017

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1	tasting booth, it would take \$130 per person. So,	11:12:44
2	for three days, the cost will be \$390. And,	11:12:54
3	including the product cost that is involved in those	11:12:58
4	three days, the total amount will come to \$450.	11:13:01
5	So, if we were looking at going rotation	11:13:07
6	of this tasting event throughout the country, that	11:13:10
7	expense will amount to about \$80,000 per month. So,	11:13:14
8	currently, ENI is spending about \$80,000 a month for	11:13:19
9	this marketing purposes.	11:13:27
10	Q \$80,000 US?	11:13:31
11	A Yes, \$80,000 US per month.	11:13:35
12	Q And does Samyang Korea pay any portion of	11:13:42
13	that \$80,000?	11:13:44
14	A Yes.	11:13:55
15	Q What portion of it?	11:13:57
16	A Well, we're trying to support at least 50	11:14:10
17	per cent, but we usually fall short of that.	11:14:13
18	Q And the support you guys provide in this	11:14:17
19	marketing effort, is it based on any sort of written	11:14:21
20	agreement?	11:14:25
21	A No.	11:14:38
22	Q Is it based on some sort of an oral	11:14:38
23	agreement, or oral understanding?	11:14:45
24	A Every month, we would receive a written	11:15:19
25	marketing plan that will be -- that are being	11:15:23

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Transcript of Seunghyun Kim - Volume 2

Conducted on July 6, 2017

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1	planned. For example, how many tasting events; at	11:15:28
2	what location they are planning; and, what kind of	11:15:33
3	promotional activities they are trying to undertake.	11:15:37
4	Or, some of the events they want to sponsor with	11:15:40
5	products.	11:15:46
6	And, based on that plan, we would look at	11:15:47
7	it and then we would make our plans as to which ones	11:15:50
8	we want to support. So, this would be done on case	11:15:58
9	by case on a monthly basis.	11:16:04
10	Q For how many years has Samyang Korea	11:16:07
11	received monthly marketing plans from ENI?	11:16:09
12	A From the latter part of last year.	11:16:28
13	Q Did T. Up ever provide you guys with	11:16:31
14	written monthly marketing plans?	11:16:34
15	A No.	11:16:45
16	Q Did T. Up ever provide you guys with	11:16:46
17	anything related to their efforts to market the	11:16:49
18	product?	11:16:52
19	A No.	11:17:06
20	Q Did T. Up ever ask you guys for any sort	11:17:07
21	of marketing support?	11:17:11
22	A Yes.	11:17:20
23	Q What sorts of things do you recall them	11:17:20
24	asking for?	11:17:23
25	A They wanted to run a product sale, so they	11:17:36

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1 they conduct a tasting, and whatnot, and based on 01:19:09
2 some kind of plan, they receive support. 01:19:13

3 As far as TV advertising is concerned, 01:19:33
4 Samyang Korea is not doing TV advertising even in 01:19:35
5 Korea. And, for the statement where there is 01:19:41
6 absolutely no advertising or promotion activity, 01:19:56
7 that's something Sam Yang (USA) should have 01:19:59
8 undertaken, but in this statement, it is putting 01:20:01
9 that responsibility to Samyang Korea. 01:20:06

10 Q Was Samyang Korea providing any 01:20:12
11 advertising or promotional support to Sam Yang (USA) 01:20:14
12 in early 2014? 01:20:18

13 A No. 01:20:31

14 Q Sir, paragraph numbered three, Mr. Yeo is 01:20:32
15 indicating that Nongshim, Ottogi and Paldo did not 01:20:40
16 have any price increase in 2012 and 2013. Do you 01:20:47
17 agree or disagree with that statement? 01:20:55

18 A Well, I really have no way to verify 01:21:10
19 whether that is a true statement or not, but, as I 01:21:14
20 told you before, Sam Yang (USA) was receiving most 01:21:33
21 competitive price, compared to any country or any 01:21:36
22 region. 01:21:41

23 As I told you before, whenever we tried to 01:21:50
24 increase price of Sam Yang (USA), it never took 01:21:54
25 place as we intended. 01:22:00

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1	Q What do you mean by that?	01:22:09
2	A Whenever we suggest a price increase of	01:22:40
3	certain products, if we look at when, actually, that	01:22:44
4	price increase took place, or what products had	01:22:52
5	price increase, it's never the same as what we	01:22:57
6	suggested. They constantly tried to negotiate with	01:23:01
7	us and it did not become effective until much later	01:23:06
8	time.	01:23:12
9	Q Sir, paragraph number four, Mr. Yeo	01:23:15
10	suggests that Sam Yang (USA) had not been able to	01:23:20
11	import any new products for 10 to 15 years. Did you	01:23:25
12	have any understanding, at the time you read this,	01:23:30
13	in January 2014, as to whether or not that statement	01:23:34
14	was accurate or not?	01:23:37
15	A That is a correct statement.	01:24:04
16	Q Then he goes on to identify some products	01:24:08
17	that were -- have been discontinued. Are those --	01:24:10
18	is that an accurate representation of products that	01:24:14
19	had been discontinued?	01:24:17
20	A Until 2015, Samyang Foods Co. Ltd.	01:24:50
21	manufactured, basically, for domestic consumption.	01:24:54
22	So, therefore, we really did not have new products	01:25:02
23	for export purposes.	01:25:07
24	Q All right, Sir. Paragraph number five,	01:25:10
25	he's talking about the severe stale smell issue.	01:25:15

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C E R T I F I C A T E

I, Giselle M. Mitchell, RPR, CRI, do hereby
certify that the witness was first duly sworn by me pursuant to
stipulation of counsel and that I was authorized to and did
report said proceedings.

I further certify that the foregoing transcript is a
true and correct record of the proceedings; that said proceedings
were taken by me stenographically and thereafter reduced to
typewriting under my supervision; that reading and signing was
not requested; and that I am neither attorney nor counsel for,
nor related to or employed by, any of the parties to the action
in which this deposition was taken; and that I have no interest,
financial or otherwise, in this case.

IN WITNESS WHEREOF, I have hereunto set my hand this
18th day of July, 2017.



GISELLE M. MITCHELL, RPR, CRI

EXHIBIT 29

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UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

SAM YANG (U.S.A.), INC.;
ROYPAC, INC. dba S.C.
CONTINENT CORPORATION;

Plaintiffs,

vs.

SAMYANG FOODS CO., LTD.; and
Does 1 through 20, inclusive

Defendants.

SAMYANG FOODS CO., LTD.,

Counter-Claimant,

vs.

SAM YANG (U.S.A.), INC.;
ROYPAC, INC. dba S.C.
CONTINENT CORPORATION;
MUN-KYUNG CHUN, and Does 1
through 20, inclusive

Counter-Defendants.

Case No. 2:15-cv-07697-AB-KS

**SAMYANG (U.S.A.), INC.'S
RESPONSES TO DEFENDANT
SAMYANG FOODS CO., LTD'S
FIRST SET OF
INTERROGATORIES**

1 PROPOUNDING PARTY: Samyang Foods Co., Ltd.

2 RESPONDING PARTY: Sam Yang (U.S.A.), Inc.

3 SET: One

4 Sam Yang (U.S.A.), Inc. ("Responding Party"), through its attorneys, hereby provides
5 the following objections and responses to the First Set of Interrogatories propounded by
6 Samyang Foods Co., Ltd.

7 **PRELIMINARY STATEMENT**

8 These responses are based upon Responding Party's perception and understanding of the
9 nature and type of information requested and upon information presently known and available
10 to Responding Party and its attorneys of record in this action. Responding Party has not
11 completed its investigation of facts and documents, its discovery, or its preparation for trial.
12 Responding Party anticipates that further discover, investigation, legal research, and analysis
13 will supply additional facts and add meaning to known facts, all of which may lead to
14 substantial changes or variations in the responses referenced below. Without obligating herself
15 to do so, Responding Party hereby reserves the right to supplement, revise, modify, or amend
16 these responses and to correct any inadvertent errors or omissions which may be contained
17 herein in light of information which it may subsequently obtain or discover, and to rely upon
18 such information in subsequent proceedings, motions, or at trial in this action.

19 These responses are made solely for the purpose of, and in relation to, this action. Each
20 response is given subject to all appropriate objections and grounds therefore are reserved and
21 may be interposed without limitation at a later time.

22 **GENERAL OBJECTIONS**

23 In addition to those grounds for objection which may be set forth specifically in
24 response to a particular interrogatory, Responding Party objects generally to each interrogatory
25 on the following grounds, and each of Responding Party's individual responses incorporates,
26 and is to be read in light of, these General Objections:

27 1. Except for explicit facts admitted herein, no admissions of any nature whatsoever
28 are implied or should be inferred from the responses or objections to the Interrogatories.

2. Responding Party objects to the Interrogatories and specifically to each interrogatory therein to the extent it calls for information which is protected from disclosure by (a) the attorney-client privilege; (b) the work product doctrine; or (c) any other privilege or doctrine. Responding Party will not provide any information it contends is protected under any such privilege and/or doctrine.

3. Responding Party objects to the Interrogatories and specifically to each interrogatory therein to the extent it purports to require Responding Party to disclose private, privileged, confidential, and proprietary commercial information or business information containing trade secrets, and Responding Party and his counsel hereby assert all applicable privileges and rights to privacy with respect to such information. To the extent that Responding Party agrees to produce such information subject to his objections, production would be under the terms of a stipulated protective order as appropriate.

4. Responding Party objects to any interrogatory to the extent that it seeks the identification of "all," "each," "any," or "every" fact, person, or document of a specific nature or type when a limited number of such facts, persons, or documents would supply the requested information, on the grounds that such a requirement makes the interrogatory overbroad, unduly burdensome, and oppressive.

5. Responding Party objects to the Interrogatories and specifically to each interrogatory therein to the extent it purports to require Responding Party to provide any information not in its possession, custody, or control, or already in the possession of Propounding Parties or its counsel, or equally available to Propounding Parties or its counsel, on the grounds that such interrogatory is unnecessary, unduly burdensome, and oppressive, constitutes annoyance, harassment, and oppression of Responding Party and goes beyond the obligations imposed or authorized by California law.

6. Responding Party objects to the Interrogatories to the extent they seek information about individuals or entities who are not parties to this action.

1 7. Responding Party objects to each of the Interrogatories to the extent it seeks
2 information that is neither relevant to the subject matter of this action nor reasonably calculated
3 to lead to the discovery of admissible evidence, and therefore, beyond the scope of discovery.

4 8. These responses are given without waiving, and expressly reserving: (a) all
5 objections as to the competency, relevancy, materiality, and admissibility of the responses and
6 the subject matter thereof as evidence for any purpose in any further proceeding in this action,
7 including the trial of this action, or in any other action; (b) all privileges, including the attorney-
8 client privilege and the work product doctrine; and (c) the right to object to the use of such
9 responses, or the subject matter thereof, on any ground in any further proceeding in this action,
10 including the trial of this action, or in any other action.

11 9. These General Objections are hereby incorporated by this reference into the
12 Specific Responses below.

13
14 **RESPONSES TO SPECIAL INTERROGATORIES**

15 **INTERROGATORY NO. 1**

16 IDENTIFY any and all of YOUR current and former employees or agents who are or
17 have been involved in dealings with Samyang under the DISTRIBUTION AGREEMENT.

18 **RESPONSE TO INTERROGATORY NO. 1**

19 Responding Party objects to this Interrogatory as vague and ambiguous. Responding Party
20 further objects to this Interrogatory as overbroad in time and scope. Subject to and without
21 waiving the general objections, and to the extent that Responding Party understands the
22 Interrogatory, Responding Party responds as follows: Roypac, Inc. has primarily been the
23 company dealing with Samyang regarding the Distribution Agreement as Responding Party's
24 agent.

25
26 **INTERROGATORY NO. 2**

27 IDENTIFY all of YOUR current and former employees or agents who are or have been
28 involved in negotiations or COMMUNICATIONS RELATING TO termination of the
DISTRIBUTION AGREEMENT.

1 **RESPONSE TO INTERROGATORY NO. 2**

2 Responding Party objects to this Interrogatory as vague and ambiguous. Responding Party
3 further objects to this Interrogatory as overbroad in time and scope. Subject to and without
4 waiving the general objections, and to the extent that Responding Party understands the
5 Interrogatory, Responding Party responds as follows: Roypac, Inc.'s employees have primarily
6 been handling discussions regarding any purported termination of the Distribution Agreement.
7

8 **INTERROGATORY NO. 3**

9 IDENTIFY all of YOUR current and former employees or agents who were involved in
10 negotiations or COMMUNICATIONS RELATING TO execution of the DISTRIBUTION
11 AGREEMENT prior to November 29, 1997.
12

13 **RESPONSE TO INTERROGATORY NO. 3**

14 Responding Party objects to this Interrogatory as vague and ambiguous. Subject to and
15 without waiving the general objections, and to the extent that Responding Party understands the
16 Interrogatory, Responding Party responds as follows: Mun Kyung Chun, Byung Tae Kim, Jong
17 Min Lee.
18

19 **INTERROGATORY NO. 4**

20 IDENTIFY each act or omission by SAMYANG that supports YOUR contention in
21 paragraph 14 of the FAC that SAMYANG breached the DISTRIBUTION AGREEMENT by
22 exporting its products to the United States, Canada, and Mexico.

23 **RESPONSE TO INTERROGATORY NO. 4**

24 Responding Party objects to this interrogatory to the extent it requires Responding Party to
25 create a compilation from documents. Subject to and without waiving the general objections, and
26 to the extent that Responding Party understands the Interrogatory, Responding Party responds as
27 follows: SAMYANG has breached the Distribution Agreement continuously since as early as
28 2006, and possibly even earlier. Discovery is currently ongoing and the full extent of Samyang's
breach is currently unknown. Responding Party is currently aware that Samyang has shipped

1 products in breach of the Distribution Agreement to many companies in North America, including
2 ENI Dist, Inc., T.Up Trading, Inc., Seohae Fisher USA, Inc., Express21, Inc., A2M U.S.A., Inc.,
3 Pioneer Logistics, Inc., Ho-Won Trading Canada, Pan Asia Food Co., Ltd., Total Express HQ,
4 and Suhkyong Canada Ltd. Responding Party reserves the right to supplement this response with
5 additional detail once discovered. Facts are alleged in the FAC, and shipping documents that are
6 in Responding Party's possession that show shipments to other parties in the United States is
7 produced in response to the requests for production.
8

9 **INTERROGATORY NO. 5**

10 STATE all facts supporting YOUR contention in paragraph 30 of the FAC that Samyang
11 breached its obligation under the DISTRIBUTION AGREEMENT to timely modify its products
12 for import to the United States by SYUSA.

13 **RESPONSE TO INTERROGATORY NO. 5**

14 Responding Party objects to this interrogatory as the information is equally available to
15 Propounding Party. Subject to and without waiving the general objections, and to the extent that
16 Responding Party understands the Interrogatory, Responding Party responds as follows:
17 Discovery is currently ongoing and all the facts are not currently yet known to Plaintiffs.
18 Samyang would periodically release new products in Korea, which would contain ingredients that
19 were not always compliant with FDA regulations. When Plaintiffs would place orders for these
20 new products, Samyang would consistently delay making the changes needed to allow Plaintiffs
21 to import and sell the product in the United States. Furthermore, Samyang would make the
22 necessary ingredient changes and then hide this fact from Plaintiffs, and would instead sell these
23 products to other distributors in violation of the Distribution Agreement. Facts are alleged in the
24 FAC.
25

26 **INTERROGATORY NO. 6**
27
28

1 STATE all facts supporting YOUR contention in paragraph 33 of the FAC that Samyang's
2 failure to provide SYUSA with popular new products has hindered growth of SYUSA's business
3 and market share in the United States.

4 **RESPONSE TO INTERROGATORY NO. 6**

5 Responding Party objects to this interrogatory as the information is equally available to
6 Propounding Party. Subject to and without waiving the general objections, and to the extent that
7 Responding Party understands the Interrogatory, Responding Party responds as follows:
8 Discovery is currently ongoing and all the facts are not currently yet known to Plaintiffs.
9 Samyang would periodically release new products in Korea, which would contain ingredients that
10 were not always compliant with FDA regulations. When Plaintiffs would place orders for these
11 new products, Samyang would consistently delay making the changes needed to allow Plaintiffs
12 to import and sell the product in the United States. Furthermore, Samyang would make the
13 necessary ingredient changes and then hide this fact from Plaintiffs, and would instead sell these
14 products to other distributors in violation of the Distribution Agreement. Samyang's deliberate
15 failure to provide Plaintiffs with new products would cause Plaintiffs to miss key growth
16 opportunities when there was hype and buzz regarding new products that were released in Korea.
17 Customers, and in particular the Korean-American general population in North America, are
18 plugged into media and social media outlets and hear about new products that are released in
19 Korea. By the time that the products actually are shipped to Plaintiffs, customers have moved on
20 to new products that were released by competitors, thus stymieing the growth potential of
21 Plaintiffs. Facts are alleged in the FAC.

22
23 **INTERROGATORY NO. 7**

24 STATE all facts supporting YOUR contention in paragraph 34 of the FAC that Samyang
25 breached the DISTRIBUTION AGREEMENT by requiring YOU to pay for goods in advance of
26 shipment.

27 **RESPONSE TO INTERROGATORY NO. 7**

1 Responding Party objects to this interrogatory as the information is equally available to
2 Propounding Party. Subject to and without waiving the general objections, and to the extent that
3 Responding Party understands the Interrogatory, Responding Party responds as follows: The
4 Distribution Agreement contains key payment terms governing the payment of goods that
5 Plaintiffs ordered from Samyang. The Distribution Agreement clearly states that the payment
6 terms cannot be changed. Samyang breached the Distribution Agreement by unilaterally changing
7 the payment terms on Plaintiffs and requiring that Plaintiffs make different payment arrangements
8 under the threat of not being able to continue to place purchase orders to be fulfilled.

9
10
11 **INTERROGATORY NO. 8**

12 STATE all facts supporting YOUR contention in paragraph 36 of the FAC that Samyang
13 does not require payment prior to shipment of goods to its other distributors.

14 **RESPONSE TO INTERROGATORY NO. 8**

15 Responding Party objects to this Interrogatory as vague and ambiguous. Subject to and
16 without waiving the general objections, and to the extent that Responding Party understands the
17 Interrogatory, Responding Party responds as follows: Discovery is currently ongoing. However,
18 Samyang has distributorship agreements with distributors in other countries or other geographic
19 locations where Samyang does not require payment prior to the shipment of goods.

20
21 **INTERROGATORY NO. 9**

22 IDENTIFY each act or omission by Samyang that YOU contend violated any provision of
23 statutory of common intellectual property law.

24 **RESPONSE TO INTERROGATORY NO.9**

25 Responding Party objects to this Interrogatory as vague and ambiguous. Responding Party
26 further objects as this information is equally available to Propounding Party. Subject to and
27 without waiving the general objections, and to the extent that Responding Party understands the
28 Interrogatory, Responding Party responds as follows: Discovery is currently ongoing. However,

Samyang was required to assign all trademarks and other intellectual property to Responding Party pursuant to the Distribution Agreement, and Responding Party is the rightful owner of all of the "Samyang" trademarks and intellectual property in the United States. Any use by any other company, including the unlawful assignment or licensing of the "Samyang" trademark to other companies by Samyang, is a violation and breach of the ownership rights of the "Samyang" trademark held by Responding Party. This includes the sale and distribution of Samyang's products to other companies in North America for resale, as such products bear the "Samyang" trademark, which can only be used with Responding Party's permission. Discovery is currently ongoing into the various sales and distribution of products made by Samyang to other parties in North America.

INTERROGATORY NO. 10

For each separate act or omission identified in Interrogatory No. 9, state all facts supporting YOUR contention that Samyang engaged in that act or omission.

RESPONSE TO INTERROGATORY NO. 10

Responding Party objects to this Interrogatory as vague and ambiguous. Responding Party further objects as this information is equally available to Propounding Party. Subject to and without waiving the general objections, and to the extent that Responding Party understands the Interrogatory, Responding Party responds as follows: Discovery is currently ongoing. However, Samyang was required to assign all trademarks and other intellectual property to Responding Party pursuant to the Distribution Agreement, and Responding Party is the rightful owner of all of the "Samyang" trademarks and intellectual property in the United States. Any use by any other company, including the unlawful assignment or licensing of the "Samyang" trademark to other companies by Samyang, is a violation and breach of the ownership rights of the "Samyang" trademark held by Responding Party. This includes the sale and distribution of Samyang's products to other companies in North America for resale, as such products bear the "Samyang" trademark, which can only be used with Responding Party's permission. Discovery is currently

1 ongoing into the various sales and distribution of products made by Samyang to other parties in
2 North America.

3
4 **INTERROGATORY NO. 11**

5 State all facts supporting YOUR contention in paragraph 55 of the FAC that a conspiracy
6 to increase Samyang's Korean domestic ramen prices resulted in artificially inflated prices of
7 ramen YOU purchased from Samyang for sale in the United States.

8 **RESPONSE TO INTERROGATORY NO. 11**

9 Responding Party further objects to this Interrogatory as overbroad in time and scope.
10 Responding Party further objects as this information is equally available to Propounding Party.
11 Responding Party objects to this Interrogatory as vague and ambiguous. Subject to and without
12 waiving the general objections, and to the extent that Responding Party understands the
13 Interrogatory, Responding Party responds as follows: Discovery is currently ongoing. However,
14 Samyang artificially inflated the prices of ramen in conjunction with other ramen manufacturers
15 in Korea. The increases in prices were made under the pretense that the prices of raw materials or
16 ingredients had increased, when in fact the raises were made primarily as a result of an agreement
17 to artificially inflate prices with other manufacturers. Additional facts are alleged in the FAC, and
18 additional discovery will provide more detail into this.

19
20 **INTERROGATORY NO. 12**

21 State all facts supporting YOUR contention in paragraph 76 of the FAC that Samyang
22 acted in bad faith to intentionally disrupt YOUR business.

23 **RESPONSE TO INTERROGATORY NO. 12**

24 Responding Party objects to this Interrogatory as the information sought is equally
25 available to the Propounding Parties. Subject to and without waiving said objections, and to the
26 extent that Responding Party understands the Interrogatory, Responding Party responds as
27 follows: Discovery is currently ongoing. However, the FAC contains the facts regarding
28 Samyang's actions. All of the actions that Samyang took as alleged in the FAC were done with no

1 justification and with purely the intention of making it more difficult for Plaintiffs to conduct
2 business. Samyang deliberately continuously breached the Distribution Agreement in an effort to
3 undermine Plaintiffs' business because Samyang did not like the terms of the Distribution
4 Agreement that had been mutually agreed upon at a time when a different person was in charge of
5 Samyang.

6
7 **INTERROGATORY NO. 13**

8 Do YOU contend that the DISTRIBUTION AGREEMENT is not subject to termination
9 prior to expiration of the 100-year contract term?

10 **RESPONSE TO INTERROGATORY NO. 13**

11 Responding Party objects to this Interrogatory as the information sought is equally
12 available to the Propounding Parties. Subject to and without waiving said objections, and to the
13 extent that Responding Party understands the Interrogatory, Responding Party responds as
14 follows: Yes, the Distribution Agreement does not contain a termination provision and is not
15 subject to unilateral termination.

16
17 **INTERROGATORY NO. 14**

18 State all facts RELATING TO YOUR answer to Interrogatory No. 13.

19 **RESPONSE TO INTERROGATORY NO. 14**

20 Responding Party objects to this Interrogatory as the information sought is equally
21 available to the Propounding Parties. Subject to and without waiving said objections, and to the
22 extent that Responding Party understands the Interrogatory, Responding Party responds as
23 follows: The Distribution Agreement does not contain a termination provision and is not subject
24 to unilateral termination. Furthermore, Plaintiffs have complied with the terms of the Distribution
25 Agreement, and have intentions of continuing to perform under the terms of the Distribution
26 Agreement.

27
28 **INTERROGATORY NO. 15**

1 Do YOU contend that as of November 29, 1997, the payment term under the
2 DISTRIBUTION AGREEMENT was fixed at payment within 90 days after delivery of goods?

3 **RESPONSE TO INTERROGATORY NO. 15**

4 Responding Party objects to this Interrogatory as the information sought is equally
5 available to the Propounding Parties. Subject to and without waiving said objections, and to the
6 extent that Responding Party understands the Interrogatory, Responding Party responds as
7 follows: Yes.

8
9 **INTERROGATORY NO. 16**

10 State all facts RELATING TO YOUR answer to Interrogatory No. 15.

11 **RESPONSE TO INTERROGATORY NO. 16**

12 Responding Party objects to this Interrogatory as the information sought is equally
13 available to the Propounding Parties. Subject to and without waiving said objections, and to the
14 extent that Responding Party understands the Interrogatory, Responding Party responds as
15 follows: The Distribution Agreement specifically contains a provision regarding payment terms
16 for goods, specifically that the payment terms would be maintained at the levels at the time the
17 Distribution Agreement was entered and that it would not be changed.

18
19 **INTERROGATORY NO. 17**

20 Do YOU contend that the DISTRIBUTION AGREEMENT prohibits any change in
21 payment terms by Samyang?

22 **RESPONSE TO INTERROGATORY NO. 17**

23 Responding Party objects to this Interrogatory as the information sought is equally
24 available to the Propounding Parties. Subject to and without waiving said objections, and to the
25 extent that Responding Party understands the Interrogatory, Responding Party responds as
26 follows: Yes.

27
28 **INTERROGATORY NO. 18**

1 State all facts RELATING TO YOUR answer to Interrogatory No. 17.

2 **RESPONSE TO INTERROGATORY NO. 18**

3 Responding Party objects to this Interrogatory as the information sought is equally
4 available to the Propounding Parties. Subject to and without waiving said objections, and to the
5 extent that Responding Party understands the Interrogatory, Responding Party responds as
6 follows: The Distribution Agreement contains specific terms regarding payment for goods and
7 does not contain any terms allowing for the modification thereof, especially not unilaterally.
8 Specifically, the Distribution Agreement states that "SAMYANG KOREA shall not... change the
9 payment terms."

10
11 **INTERROGATORY NO. 19**

12 Do YOU contend that YOU have used best efforts to generate sales for Samyang between
13 November 29, 1997 and July 31, 2016?

14 **RESPONSE TO INTERROGATORY NO. 19**

15 Responding Party objects to this Interrogatory as overbroad and vague and ambiguous.
16 Subject to and without waiving said objections, and to the extent that Responding Party
17 understands the Interrogatory, Responding Party responds as follows: Yes.

18
19 **INTERROGATORY NO. 20**

20 State all facts RELATING TO YOUR answer to Interrogatory No. 19.

21 **RESPONSE TO INTERROGATORY NO. 20**

22 Responding Party objects to this Interrogatory as overbroad and vague and ambiguous.
23 Subject to and without waiving said objections, and to the extent that Responding Party
24 understands the Interrogatory, Responding Party responds as follows: Plaintiffs have continuously
25 engaged in the business of distributing Samyang's products despite minimal to no support from
26 Samyang. Plaintiffs have had to create relationships, build distribution networks, and market and
27 sell Samyang products despite no advertising or marketing support from Samyang, and despite
28 Samyang actively taking steps to disrupt Plaintiffs' business through such measures like

1 artificially raising prices, changing payment terms, selling products into Plaintiffs' market without
2 Plaintiffs' knowledge or consent, and not matching FDA regulations until the buzz behind new
3 products is already dead. Furthermore, Responding Party took active steps to mitigate any
4 damages when Samyang Foods shipped defective products to the U.S. in an effort to damage
5 Responding Party's business, where the products emitted a horrible and disgusting stench that
6 caused the food to be inedible.

7
8 **INTERROGATORY NO. 21**

9 IDENTIFY any and all of the customers located in the East Coast region of the United
10 states that YOU contend that YOU have provided Samyang products.

11 **RESPONSE TO INTERROGATORY NO. 21**

12 Responding Party objects to this Interrogatory as overbroad in time and scope, and is
13 vague and ambiguous. Subject to and without waiving said objections, and to the extent that
14 Responding Party understands the Interrogatory, Responding Party responds as follows: Grand
15 Supercenter, Inc., Wang Globalnet, Rhee Bros, Inc., D.Y. Import Co., Inc., CJ Foods, Inc., Seoul
16 Shik Poom.

17
18 **INTERROGATORY NO. 22**

19 DESCRIBE any and all distribution channels in the East Coast region of the United States
20 that YOU contend that YOU identified and developed for Samyang products.

21 **RESPONSE TO INTERROGATORY NO. 22**

22 Responding Party objects to this Interrogatory as overbroad in time and scope, and is
23 vague and ambiguous. Responding Party further objects as this Interrogatory is duplicative of
24 Interrogatory No. 21.

25
26 **INTERROGATORY NO. 23**

27 State all facts supporting YOUR contention in paragraph 84 of the FAC that the value of
28 the remaining 81 years of the DISTRIBUTION AGREEMENT is in excess of one billion dollars.

1 **RESPONSE TO INTERROGATORY NO. 23**

2 Responding Party objects to this Interrogatory as overbroad and vague and ambiguous.
3 Responding Party further objects as this interrogatory seeks premature disclosure of expert
4 opinion.

6 **INTERROGATORY NO. 24**

7 IDENTIFY each copyright or trademark YOU have registered or attempted to register in
8 the United States RELATING TO Samyang or Samyang's food products, including the product
9 name, date of initial and subsequent applications, and date of approval, if any.

10 **RESPONSE TO INTERROGATORY NO. 24**

11 Responding Party objects to this Interrogatory as overbroad and vague and ambiguous.
12 Subject to and without waiving said objections, and to the extent that Responding Party
13 understands the Interrogatory, Responding Party responds as follows: Plaintiffs own the rights to
14 all "SAMYANG" trademarks. Plaintiffs are currently in the process of attempting to renew the
15 applications for Samyang Ramen and Samyang Cup Ramen in conjunction with Plaintiffs'
16 ownership rights to those names, and the applications are currently pending.

18 **INTERROGATORY NO. 25**

19 DESCRIBE all actions YOU took from April 21, 2016 and August 1, 2016 to avoid or
20 mitigate any alleged business losses or damages from resulting from termination of the
21 DISTRIBUTION AGREEMENT, including, but not limited to, any negotiations, agreements, or
22 COMMUNICATIONS with manufacturers, retailers, or distributors.

23 **RESPONSE TO INTERROGATORY NO. 25**

24 Responding Party objects to this Interrogatory as overbroad and vague and ambiguous.
25 Subject to and without waiving said objections, and to the extent that Responding Party
26 understands the Interrogatory, Responding Party responds as follows: Plaintiffs have continued to
27 place purchase orders with Samyang for fulfillment pursuant to the terms of the Distribution
28 Agreement. Plaintiffs also continue to enforce their rights to the exclusive distribution rights of

1 Samyang products in North America, including taking active measures to stop the illegal import
2 and distribution of Samyang products without Plaintiffs' knowledge or consent.
3
4

5 Dated: October 17, 2016

SUH LAW GROUP, APC

7
8 By: /s/ Edward Suh

Edward Suh

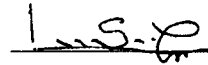
Attorneys for Plaintiff/Counterdefendants
9 SAM YANG (U.S.A.), INC., ROYPAC, INC.,
10 MUN-KYUNG CHUN
11
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VERIFICATION

I am an authorized agent of Sam Yang (U.S.A.), Inc., a party in the above-entitled action and the Responding Party to Samyang Foods Co., Ltd.'s First Set of Interrogatories. I have reviewed the foregoing Responses and know the contents thereof. The same is true of my own knowledge, except as to those matters that are therein alleged on information and belief, and as to those matters, I believe them to be true.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on October 18, 2016 at Los Angeles, California.



See Young Lee

EXHIBIT 30

Samyang Foods Co., Ltd.

Address 82-9, Hawolgok 1-dong, Songbuk-gu, Seoul, 136-131, Republic of Korea
Home Page : <http://www.samyangfood.co.kr>
E-mail : gongwook@hotmail.com
Telephone : +82-2-940-3340-4, 940-3382
Facsimile : +82-2-919-6180

To : S. C. CONTINENT CORPORATION
Attn. : Managing Director Si Young Lee, General Manager Woonbae Yeo
From : Overseas Sales Team

Date: NOV. 27, 2008.
Total page(s) :1
including this covering

Subject: Regarding price as of November 14 & our direct export to Central and South America sales market

How are you?

Please see our reply as follows regarding the price in the business communication dated November 14 for your reference.

At your request, both companies agreed to reflect the price increased in January 2008 only partially and suspend it until October, and to apply normal price from November 1, so normal price was applied starting with the order (08-104th) received after November 2008. However, as to your request to reserve November price adjustment due to exchange rate increase and worsening of the U.S. market situation and to apply the previous price retrospectively to the volume already shipped with the adjusted price, please understand that we cannot adjust the price as there are problems of price equity with other regions and technical issues with the computer.

However, price adjustment is reserved in the method of supporting USD 1,000.- per container as Promotion Supporting for the difference between the increased price and the previous price up to 1/4Q 2009. (Support will stop as of 1/4Q when the exchange rate is stable as below 1300KRW, and will continue to 2/4Q and stop if over 1300KRW.)

The difference from the previous price of 6 containers from the 104th already shipped in November is USD6,467.-, so additional Promotion Supporting of \$650 each will be provided over 10 shipments thereafter.

(104,105,106,107,109,111: already shipped at the increased price)

Thank you for allowing us to have direct transaction with the Central and South Americas over the phone today upon our many requests, with the region where it is difficult for your company to supply(Central and South Americas, etc.) among the American markets. I would like to express my deep gratitude again for your understanding so that there could be positive results for our company's product sales in regions such as Mexico, Ecuador, Guatemala, and Chile.

Sincerely, Jong-gi Kim / Gong-wook Kim

CC.

SAMYANG FOODS, a Ramen Manufacturer with a proud history of 40 years' tradition based on Honesty and Credit

Samyang Foods Co., Ltd.

Address : 82-9, Hawolgok 1-dong, Songbuk-gu, Seoul, 136-131, Republic of Korea

Home Page : <http://www.samyangfood.co.kr>

E-mail : gongwook@hotmail.com

Telephone : +82-2-940-3340~4, 940-3382

Facsimile : +82-2-919-6180

To : S. C. CONTINENT CORPORATION

Date : NOV. 27. 2008.

Attn. : 이 시영 상무님, 여 운배 부장님

Total Page(s) : 1

From : 해외영업 팀

including this covering

Subject : 11 월 14 일자 가격관련 건 & 중남미 판매 시장 당사 직수출의 건.

안녕하십니까.

11 월 14 일 자 보내주신 업무연락의 가격 관련 사항에 대하여 아래와 같이 회신 드리오니
업무에 참조하시기 바랍니다.

귀사의 요청에 의해, 2008 년 1 월 인상한 가격을 일부만 반영하여 10 월까지 유예하고, 11 월
1 일부터 정상가격으로 하기로 양 사가 협의 하여, 2008 년 11 월 이후에 접수된 오더(08-
104 차)부터 정상 가격을 적용하였습니다. 그러나 환율 상승 및 미국시장 상황의 악화 등으로
인해 11 월 가격 조정을 보류하고, 또한 이미 조정된 가격으로 기 출고 물량도 종전 가격으로
소급 하여 적용해 달라고 요청하신 점에 대해서는 타 지역과의 가격 형평성 및 전산상 기술적
문제가 있어 가격 조정을 할 수 없음을 양지하여 주시기 바랍니다.

단, 2009 년 1/4 분기까지 각 컨테이너 당 인상 가와 구가의 차익분 을 **Promotion Supporting** 으로
USD1,000.- 씩 지원하는 방식으로 가격 조정을 유예합니다. (환율 1300 원 이하로 안정 시
1/4 분기로 지원 중단, 1300 원 이상 시, 2/4 분기로 연장 후 중단.)

11 월 기 선적된 104 차부터 6 컨테이너의 구가와 차이는 USD6,467.-이므로 이후 선적 분부터
10 회에 걸쳐 650 불씩 추가로 **Promotion Supporting** 해 드리도록 하겠습니다.

(104, 105, 106, 107, 109, 111 차: 인상가격으로 기 출고 됨)

미주 시장 중, 귀사에서 공급하기 어려운 지역(중남미 등)에 당사의 여러 차례 요청에, 금일
유선상으로 당사의 중남미 지역 직거래를 허락해 주심에 감사 드립니다. 멕시코, 에콰도르,
과테말라, 칠레 등의 지역에 당사 제품 판매에 긍정적인 결과가 올 수 있도록 이해해 주심에 다시
한번 깊이 감사 드립니다.

진 중 기 / 김 공 욱 배상

CC.

SAMYANG FOODS, a Ramen Manufacturer with a proud history of 40 years' tradition based on Honesty and Credit.

CERTIFICATION OF TRANSLATION

and

DECLARATION

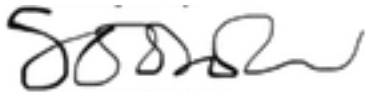
State of California)
) S. S.
Los Angeles County)

I, Soomi Ko, the undersigned, declare under penalty of perjury that I am a duly certified Korean Court Interpreter approved by the United States District Courts, certified by the State of California and the Los Angeles County Superior Courts, with competent knowledge of Korean and English, and that I have truthfully and correctly translated the pages of **8 documents with bates numbers as below** from Korean to English in accordance with Fed. R. Evid. 901 and that the said translation is, to the best of my knowledge and belief, a true and correct translation. I further declare under penalty of perjury that I am neither counsel for, related to, nor employed by any of the parties, and that I have no financial or other interest in the outcome of any action related to this translation. I declare under penalty of perjury that the foregoing is true and correct.

Detailed Description of Translations

1. SAMYANG0003340
2. SAMYANG0003344-45
3. SAMYANG0002848-51
4. SAMYANG0002776
5. SAMYANG0002717
6. SAMYANG0001066-68
7. SAMYANG0019241
8. SAMYANG0002986-87

Executed on November 1, 2017



Soomi Ko
California State Certified Court Interpreter
#300732
Direct: (213) 999-7848
soomi@komartin.com
www.komartin.com

Ko & Martin Certified Interpreters and Translators
Specializing in Korean and Chinese Languages

EXHIBIT 31

DEC-05-2008 18:17 From:

To: 919 6180

P.1/2

S. C. Continent Corporation

10316 Norwalk Blvd., Santa Fe Springs, CA 90670
Tel. (562) 941-7879 Fax. (562) 946-9915

FAX NO
DATE 12/5/2008
TO General Manager Jong-gi Jin
FROM General Manager Woonbae Yeo
SUBJECT Business communication

CLERK	A-MGR	MGR	EXEC	FRGS

1. Our company is placing the order as follows so please ship them.

P.O. No. 08-122 (paid shipping) DEST: S.C.
Samyang Ramen 1600CT Samyang Ramen(Multi) 1400CT

Total 3000CT 40HQ x 1VAN CBM67.86

P.O. No. 08-123 (paid shipping) DEST: S.C.
Samyang Ramen 1300CT Leebaikyang 500CT Kimchee Ramen (20)1000CT Sokogimyun 1000CT Chacharoni (Multi) 300CT

Total 4100CT 40HQ x 1VAN CBM67.16

P.O. No. 08-124 (paid shipping) DEST: S.C.
Samyang Ramen 2700CT Samyang Cup Ramen(6) 2000CT Suta Cup Ramen (6) 1500CT

Total 8200CT 40HQ x 1VAN CBM67.64

P.O. No. 08-125 (2 weeks interval after shipping P.O. No. 08-122) DEST: S.C.
Samyang Ramen (Multi) 1400CT Sutamyun (Multi) 300CT Chacharoni (Multi) 300CT Bajirak Kalgusu (Multi)180CT

Total 2180CT 40HQ x 1VAN CBM67.73

*Please make sure to ship according to the shipping schedule, and please notify our company if there is any delay.

*As discussed on the phone on 12/4, there were issues with sales for the P.O. No. below due to delayed shipping by your company. Please ship by next week.

(P.O. NO. 08-112, 113, 114, 110, 108)

2. This is to notify the "RHEE BROS" ORDER as below, so please ship them.

P.O. No. 08-126 (2 weeks interval after shipping P.O. No. 08-119) DEST: BALTIMORE
Samyang Ramen 550CT Sutamyun300CT Kalgusu(Bajirak)200CT Kimchee Ramen(20)200CT Sogokimyun 200CT
Seafood Party 100CT Chacharoni 100CT Samyang Ramen (Multi)200CT Sutamyun (Multi)150CT Bajirak Kalgusu
(Multi)100CT Bean Paste Ramen (Multi) 100CT Seafood Party (Multi)100CT Antiginmyun(Multi)200CT Udon Big
Cup 50CT Samyang Cup Ramen (6) 400CT Wang Changu 100CT Sattobap 100CT

Total 3150CT 40HQ x 1VAN CBM67.875

3. This is to notify the "CJ FOOD"(LA) ORDER as below, so please ship them.

P.O. No. 08-127 (Ship after 4 weeks) DEST: LA
Samyang Ramen 1500CT Chacharoni 500CT Sutamyun150CT Samyang Ramen (Multi)250CT Chacharoni
(Multi)100CT Sutamyun (Multi)100CT Antiginmyun (Multi)100CT Samyang Cup Ramen (6) 400CT Suta Cup Ramen
(6) 500CT Changu 100CT Sattobap 100CT

Total 3800CT 40HQ x 1VAN CBM67.47

DEC-05-2008 18:17 From:

To: 919 6180

P.2/2

4. This is to notify the "WANG GLOBALNET(ATLANTA)" ORDER as below, so please ship them.

P.O. No. 08-128 (Ship after 4 weeks)

DEST: ATLANTA

Samyang Ramen 1000CT Chacharoni 200CT Sogokimyun 100CT Sutamyun 150CT Kimchee Ramen(20)100CT Bean
Paste Ramen 50CT Kalguksu(Bajirak)100CT Antiginmyun (Multi)50CT Pojang Macha Udon 50CT Seafood Party
50CT Samyang Ramen (Multi)100CT Sogokimyun (Multi) 100CT Sutamyun (Multi)100CT Chacharoni (Multi)50CT
Bean Paste Ramen (Multi) 50CT Samyang Cup Ramen (6) 200CT Suta Cup Ramen (6) 200CT Changu 80CT Wang
Changu 75CT Sattobap 50CT

Total 2835CT 40HQ x 1VAN CBM67.48

5. Matters related to "Ramen price".

- 1) Thank you for your company's fax (dated 11/27) regarding the ramen price reduction requested in Paragraph 2 of our company's FAX (dated 11/14). Please implement as notified. Thank you. <Our sales in Central and South America regions allowed>
- 2) As a result of notifying each customer with the price you notified us, they say it is very insufficient, so please review an additional reduction in the future.
(For reference, in the case of Nongshim, all the snacks and ramen products imported from Korea are imported at 10% reduced price as of 11/1, and in the case of Paldo Ramen and Ottogi, they are imported at 15% reduced price.)

DEC-05-2008 18:17 From:

To: 919 6180

P.1/2

S. C. Continent Corporation

10310 Norwalk Blvd., Santa Fe Springs, CA 90670
 Tel. (562) 941-7879 Fax. (562) 946-9915

FAX NO :
 DATE : 12/5/2008
 TO : 진중 사무장
 FROM : 박문배부장
 SUBJECT : 업무

CLERK	A-MGR	MGR	K-EXEC	PRES

1. 당사에서 아래와 같이 ORDER 하오니 신중바랍니다.

P.O.NO.08-122(지급선결) DESTN:S.C
 삼양라면1800CT 삼양라면(유타)1400CT
 계3000CT 40HQ X 1VAN CBM87.86

P.O.NO.08-123(지급선결) DESTN:S.C
 삼양라면1300CT 이백당500CT 김치라면(20)1000CT 쇠고기면1000CT 파파모니(유타)300CT
 계4100CT 40HQ X 1VAN CBM87.18

P.O.NO.08-124(지급선결) DESTN:S.C
 삼양라면2700CT 삼양라면(8)2000CT 수타면라면(8)1500CT
 계8200CT 40HQ X 1VAN CBM87.64

P.O.NO.08-125(P.O.NO.08-122선결후 2주간격) DESTN:S.C
 삼양라면(유타)1400CT 수타면(유타)300CT 파파모니(유타)300CT 비지떡말국수(유타)180CT
 계2180CT 40HQ X 1VAN CBM87.73

* 선결 SCHEDULE 대로 꼭 선결바라아. 화환이 있을시 반드시 통보바랍니다.
 * 12/4 일자 모의한 내장과같이 회사에서 선결의 지연면 관계로 아래 P.O.NO.에 대해 판매에 차질이
 발생하였으니, 다음주내로 꼭 선결바랍니다.

(P.O.NO.08-112, 113, 114, 110, 108)

2. 아래와 같이 "BEE BROS"ORDER를 통보하오니 신중바랍니다.

P.O.NO.08-126(P.O.NO.08-119선결후 2주간격) DESTN:BALTIMORE
 삼양라면5500CT 수타면800CT 말국수(바자락)200CT 김치라면(20)200CT 쇠고기면200CT 해물파리100CT 파파모니100CT
 삼양라면(유타)200CT 수타면(유타)150CT 비지떡말국수(유타)100CT 삼양라면(유타)100CT 해물파리(유타)100CT
 안튀김면(유타)200CT 우동라면50CT 삼양라면(8)400CT 왕징구100CT 사또밥100CT
 계3150CT 40HQ X 1VAN CBM87.875

3. 아래와 같이 "LA" ORDER를 통보하오니 신중바랍니다.
 (C.S.Food)

P.O.NO.08-127(4주후선결) DESTN:LA
 삼양라면1500CT 파파모니500CT 수타면150CT 삼양라면(유타)250CT 파파모니(유타)100CT 수타면(유타)100CT
 안튀김면(유타)100CT 삼양라면(8)400CT 수타면라면(8)500CT 왕징구100CT 사또밥100CT
 계3800CT 40HQ X 1VAN CBM87.47

Confidential
#2410

DEC-05-2000 18:17 From:

To: 919 6180

P.2/2

4. 아래와 같은 GLOBAL NET(ATLANTA) ORDER를 발송하오니 신중하십시오.

(Wang Global)

DESTN: ATLANTA

P.O. NO. 08-128(4322 선제)

상향라면 1000CT 파파로니 200CT 쇠고기면 1000CT 수타면 150CT 김치라면 (20) 1000CT 된장라면 500CT 닭국수 (바지락) 1000CT
만두라면 (얼티) 500CT 푸른마치우동 500CT 해물파스타 500CT 삼양라면 (얼티) 1000CT 쇠고기면 (얼티) 1000CT 수타면 (얼티) 1000CT
파파로니 (얼티) 500CT 된장라면 (얼티) 500CT 삼양라면 (6) 2000CT 수타면라면 (8) 2000CT 왕뚜꾸 800CT 왕뚜꾸 750CT 사또밥 500CT

계 28350CT

40HQ X 1VAN

CBN07.48

5. "라면가격" 관련사항입니다.

1) 당사 FAX(11/14자) 2장에서 요청드린 라면가격 인하건에 대한, 귀사 FAX(11/27자) 감사회 잘 접수하셨습니다.
동봉하신 내용대로 실시하여 주시기를 바랍니다. 감사드립니다. *<라면에 10% 인상 대신 10% 할인>*

2) 동봉하미 주신 가격으로 각 거래선에 공보한 것과, 많이 미흡하다고 하오니 추후, 추가 인하에 대해 제 절로 바랍니다.
(참고로 농심의 경우 한국에서 수입하고 있는 정제품 소분류와 라면제품에 대해 11/1자 10% 인하 수입되고 있으며, 팔도라면, 오뚜기의 경우 15% 인하 수입되고 있습니다.)

CERTIFICATION OF TRANSLATION

and

DECLARATION

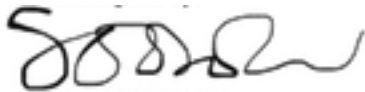
State of California)
) S. S.
Los Angeles County)

I, Soomi Ko, the undersigned, declare under penalty of perjury that I am a duly certified Korean Court Interpreter approved by the United States District Courts, certified by the State of California and the Los Angeles County Superior Courts, with competent knowledge of Korean and English, and that I have truthfully and correctly translated the pages of **8 documents with bates numbers as below** from Korean to English in accordance with Fed. R. Evid. 901 and that the said translation is, to the best of my knowledge and belief, a true and correct translation. I further declare under penalty of perjury that I am neither counsel for, related to, nor employed by any of the parties, and that I have no financial or other interest in the outcome of any action related to this translation. I declare under penalty of perjury that the foregoing is true and correct.

Detailed Description of Translations

1. SAMYANG0003340
2. SAMYANG0003344-45
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4. SAMYANG0002776
5. SAMYANG0002717
6. SAMYANG0001066-68
7. SAMYANG0019241
8. SAMYANG0002986-87

Executed on November 1, 2017



Soomi Ko
California State Certified Court Interpreter
#300732
Direct: (213) 999-7848
soomi@komartin.com
www.komartin.com

Ko & Martin Certified Interpreters and Translators
Specializing in Korean and Chinese Languages

EXHIBIT 32

HIGH = ENL

ARRIVAL DATE	QUANTITY	CONSIGNEE	NOTIFY PARTY	REMARKS
11-10-07	2,560	SEOHAE FISHERY	SEOHAE FISHERY	
11-12-07	3,570	SEOHAE	SEOHAE	
11-12-07	3,570	SEOHAE	SEOHAE	
12-01-07	3,570	SEOHAE	SEOHAE	
12-14-07	3,300	SEOHAE	SEOHAE	
01-17-08	3,550	SEOHAE	SEOHAE	
01-17-08	3,650	SEOHAE	SEOHAE	
02-03-08	3,550	SEOHAE	SEOHAE	
02-03-08	3,650	SEOHAE	SEOHAE	
02-20-08	3,700	SEOHAE	SEOHAE	
02-20-08	3,800	SEOHAE	SEOHAE	
02-28-08	3,700	SEOHAE	SEOHAE	
02-28-08	3,900	SEOHAE	SEOHAE	
03-10-08	3,700	SEOHAE	SEOHAE	
03-10-08	3,800	SEOHAE	SEOHAE	
03-21-08	3,800	SEOHAE	SEOHAE	
03-31-08	3,500	SEOHAE	SEOHAE	
04-16-08	2,740	SEOHAE	SEOHAE	
04-16-08	3,500	SEOHAE	SEOHAE	
04-24-08	3,500	SEOHAE	SEOHAE	
05-03-08	3,500	SEOHAE	SEOHAE	
05-03-08	2,740	SEOHAE	SEOHAE	
05-03-08	2,550	SEOHAE	SEOHAE	
05-03-08	3,450	SEOHAE	SEOHAE	
06-12-08	3,310	SEOHAE	SEOHAE	
06-28-08	1,800	SEOHAE	SEOHAE	

CONTACT INFO		
Type	Name	Address
CONSIGNEE	SEOHAE FISHERY USA, INC. 	ADDRESS:7194, OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD21046TEL)410-381-6427
NOTIFY PARTY	SEOHAE FISHERY USA, INC. 	ADDRESS:7194, OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD21046TEL)410-381-6427
SHIPPER	ONE TRADING CO. 	876-618, JEONGWANG-DONGSIHEUNG-SI, KYEONGGI-DO, KOREA

PRODUCT DETAILS	
Container No.	Description Area
TGHU9008165	SOUP BASE 2,560 CTNS OF INSTANT NOODLES W/SOUP BASE @INVOICE NO. OTSY07002 FOODSTUFF

TRANSIT DETAILS	
Property	Value
CARRIER	EGLV - EVERGREEN LINE
	ADDRESS NO 163 SEC 1 HSIN-NAN ROAD LUCHU HSIAN TAOYUAN HSIEN 338 TAIWAN CONTACT NO.: 8863312320
SHIP REGISTERED IN	PANAMA
VESSEL	EVER REWARD
VOYAGE	0388E
US PORT	BALTIMORE, MARYLAND
FOREIGN PORT	COLON
COUNTRY OF ORIGIN	PANAMA
PLACE OF RECEIPT	PUSAN
BILL OF LADING	EGLV040710537149
ARRIVAL DATE	2007-11-10
QUANTITY	2560 CTN
CONTAINER COUNT	1
WEIGHT (LB / KG)	22,537 / 10,244
CBM	67 CM
HOUSE VS MASTER	

OTHER INFO	
Container No.	Marks and Numbers Area
TGHU9008165	N/M N/M THE SAME THE SAME THE SAME

CONTACT INFO		
Type	Name	Address
CONSIGNEE	SEOHAE FISHERY USA, INC. 	7194,OAKLAND MILLS ROAD(BAY1&2)COLUMBIA, MD21046TEL) 410-381-8427
NOTIFY PARTY	SEOHAE FISHERY USA, INC. 	7194,OAKLAND MILLS ROAD(BAY1&2)COLUMBIA, MD21046TEL) 410-381-8427
SHIPPER	ONE TRADING CO. 	876-618, JEONGWANG-DONGSIHEUNG-SI, KYEONGGI-DO, KOREA

PRODUCT DETAILS	
Container No.	Description Area
TEXU5346490	INSTANT NOODLES 3,570 CTNS OF INSTANT NOODLES W/SOUP BASE @ INVOICE NO. OTSY07004

TRANSIT DETAILS	
Property	Value
CARRIER	EGLV - EVERGREEN LINE
ADDRESS	NO 163 SEC 1 HSIN-NAN ROAD LUCHU HSIAN TAOYUAN HSIEN 338
TAIWAN	
CONTACT NO.:	8863312320
SHIP REGISTERED IN	PANAMA
VESSEL	EVER DEVELOP
VOYAGE	0299E
US PORT	LOS ANGELES, CALIFORNIA
FOREIGN PORT	PUSAN
COUNTRY OF ORIGIN	SOUTH KOREA
PLACE OF RECEIPT	PUSAN
BILL OF LADING	EGLV040710554035
ARRIVAL DATE	2007-11-12
QUANTITY	3570 CTN
CONTAINER COUNT	1
WEIGHT (LB / KG)	21,718 / 9,872
CBM	67 CM
HOUSE VS MASTER	

OTHER INFO	
Container No.	Marks and Numbers Area
TEXU5346490	N/M N/M THE SAME THE SAME

CONTACT INFO		
Type	Name	Address
CONSIGNEE	SEOHAE FISHERY USA, INC. 	7194, OAKLAND MILLS ROAD (BAY 1&2)COLUMBIA, MD21046TEL)410-381-6427
NOTIFY PARTY	SEOHAE FISHERY USA, INC. 	7194, OAKLAND MILLS ROAD (BAY 1&2)COLUMBIA, MD21046TEL)410-381-6427
SHIPPER	ONE TRADING CO. 	876-618, JEONGWANG-DONGSIHEUNG-SI, KYEONGGI-DO, KOREA

PRODUCT DETAILS	
Container No.	Description Area
TGHU8153805	INSTANT NOODLES 3,570 CTNS OF INSTANT NOODLES W/SOUP BASE @INVOICE NO.OTSY07003

TRANSIT DETAILS	
Property	Value
CARRIER	EGLV - EVERGREEN LINE
ADDRESS	NO 163 SEC 1 HSIN-NAN ROAD LUCHU HSIAN TAOYUAN HSIEN 338 TAIWAN
CONTACT NO.:	8863312320
SHIP REGISTERED IN	PANAMA
VESSEL	EVER DEVELOP
VOYAGE	0299E
US PORT	LOS ANGELES, CALIFORNIA
FOREIGN PORT	PUSAN
COUNTRY OF ORIGIN	SOUTH KOREA
PLACE OF RECEIPT	PUSAN
BILL OF LADING	EGLV040710552059
ARRIVAL DATE	2007-11-12
QUANTITY	3570 CTN
CONTAINER COUNT	1
WEIGHT (LB / KG)	21,718 / 9,872
CBM	67 CM
HOUSE VS MASTER	

OTHER INFO	
Container No.	Marks and Numbers Area
TGHU8153805	N/M N/M THE SAME THE SAME

CONTACT INFO		
Type	Name	Address
CONSIGNEE	SEOHAE FISHERY USA, INC. 	7194, OAKLAND MILLS ROAD (BAY 1&2) COLUMBIA, MD21046 TEL)410-381-6427
NOTIFY PARTY	SEOHAE FISHERY USA, INC. 	7194, OAKLAND MILLS ROAD (BAY 1&2) COLUMBIA, MD21046 TEL)410-381-6427
SHIPPER	ONE TRADING CO., 	876-618, JEONGWANG-DONG SIHEUNG-SI, KYEONGGI-DO, KOREA

PRODUCT DETAILS	
Container No.	Description Area
TGHU8153805	INSTANT NOODLES 3,570 CTNS OF INSTANT NOODLES W/SOUP BASE @INVOICE NO.OTS07003

TRANSIT DETAILS	
Property	Value
CARRIER	EGLV - EVERGREEN LINE
ADDRESS	NO 163 SEC 1 HSIN-NAN ROAD LUCHU HSIAN TAOYUAN HSIEN 338
TAIWAN	
CONTACT NO.:	8863312320
SHIP REGISTERED IN	PHILIPPINES
VESSEL	SUN RIGHT
VOYAGE	0391E
US PORT	BALTIMORE, MARYLAND
FOREIGN PORT	COLON
COUNTRY OF ORIGIN	PANAMA
PLACE OF RECEIPT	PUSAN
BILL OF LADING	EGLV040710552059
ARRIVAL DATE	2007-12-01
QUANTITY	3570 CTN
CONTAINER COUNT	1
WEIGHT (LB / KG)	21,718 / 9,872
CBM	67 CM
HOUSE VS MASTER	



OTHER INFO	
Container No.	Marks and Numbers Area
TGHU8153805	N/M N/M THE SAME THE SAME

CONTACT INFO		
Type	Name	Address
CONSIGNEE	SEOHAE FISHERY USA, INC. 	7194, OAKLAND MILLS ROAD (BAY1&2) COLUMBIA, MD21046 TEL)410-381-6427
NOTIFY PARTY	SEOHAE FISHERY USA, INC. 	7194, OAKLAND MILLS ROAD (BAY1&2) COLUMBIA, MD21046 TEL)410-381-6427
SHIPPER	ONE TRADING CO., 	876-618, JEONGWANG-DONG SIHEUNG-SI, KYEONGGI-DO, KOREA

PRODUCT DETAILS	
Container No.	Description Area
GVCU5038808	INSTANT NOODLES 3,300 CTNS OF INSTANT NOODLES W/SOUP BASE @ INVOICE NO. OTSY07005

TRANSIT DETAILS	
Property	Value
CARRIER	EGLV - EVERGREEN LINE
ADDRESS	NO 163 SEC 1 HSIN-NAN ROAD LUCHU HSIAN TAOYUAN HSIEN 338
TAIWAN	
CONTACT NO.:	8863312320
SHIP REGISTERED IN	PANAMA
VESSEL	EVER DECENT
VOYAGE	0393E
US PORT	BALTIMORE, MARYLAND
FOREIGN PORT	COLON
COUNTRY OF ORIGIN	PANAMA
PLACE OF RECEIPT	PUSAN
BILL OF LADING	EGLV040710567854
ARRIVAL DATE	2007-12-14
QUANTITY	3300 CTN
CONTAINER COUNT	1
WEIGHT (LB / KG)	23,734 / 10,788
CBM	66 CM
HOUSE VS MASTER	

OTHER INFO	
Container No.	Marks and Numbers Area
GVCU5038808	N/M N/M THE SAME THE SAME

CONTACT INFO		
Type	Name	Address
CONSIGNEE	SEOHAE FISHERY USA, INC. 	7194,OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD21046 TEL) 410-381-6427
NOTIFY PARTY	SEOHAE FISHERY USA, INC. 	7194,OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD21046 TEL) 410-381-6427
SHIPPER	ONE TRADING CO. 	876-618, JEONGWANG-DONG SIHEUNG-SI, KYEONGGI-DO, KOREA

PRODUCT DETAILS	
Container No.	Description Area
INKU2254048	INSTANT NOODLES W/SOUP BASE @INVOICE NO. OTSY07007

TRANSIT DETAILS	
Property	Value
CARRIER	EGLV - EVERGREEN LINE
ADDRESS	NO 163 SEC 1 HSIN-NAN ROAD LUCHU HSIAN TAOYUAN HSIEN 338 TAIWAN
CONTACT NO.:	8863312320
SHIP REGISTERED IN	PANAMA
VESSEL	EVER RESULT
VOYAGE	0308E
US PORT	LOS ANGELES, CALIFORNIA
FOREIGN PORT	PUSAN
COUNTRY OF ORIGIN	SOUTH KOREA
PLACE OF RECEIPT	PUSAN
BILL OF LADING	EGLV040710608917
ARRIVAL DATE	2008-01-17
QUANTITY	3550 CTN
CONTAINER COUNT	1
WEIGHT (LB / KG)	24,262 / 11,028
CBM	67 CM
HOUSE VS MASTER	
IN-BOND ENTRY TYPE	00 - CONSUMPTION CATEGORY

OTHER INFO	
Container No.	Marks and Numbers Area

CONTACT INFO		
Type	Name	Address
CONSIGNEE	SEOHAE FISHERY USA, INC. 	7194,OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD21046 TEL) 410-381-6427
NOTIFY PARTY	SEOHAE FISHERY USA, INC. 	7194,OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD21046 TEL) 410-381-6427
SHIPPER	ONE TRADING CO. 	876-618, JEONGWANG-DONG SIHEUNG-SI, KYEONGGI-DO, KOREA

PRODUCT DETAILS	
Container No.	Description Area
EMCU9216786	INSTANT NOODLES W/SOUP BASE @INVOICE NO. OTSY07006

TRANSIT DETAILS	
Property	Value
CARRIER	EGLV - EVERGREEN LINE
ADDRESS	NO 163 SEC 1 HSIN-NAN ROAD LUCHU HSIAN TAOYUAN HSIEN 338 TAIWAN
CONTACT NO.:	8863312320
SHIP REGISTERED IN	PANAMA
VESSEL	EVER RESULT
VOYAGE	0308E
US PORT	LOS ANGELES, CALIFORNIA
FOREIGN PORT	PUSAN
COUNTRY OF ORIGIN	SOUTH KOREA
PLACE OF RECEIPT	PUSAN
BILL OF LADING	EGLV040710617851
ARRIVAL DATE	2008-01-17
QUANTITY	3650 CTN
CONTAINER COUNT	1
WEIGHT (LB / KG)	24,592 / 11,178
CBM	68 CM
HOUSE VS MASTER	
IN-BOND ENTRY TYPE	00 - CONSUMPTION CATEGORY

OTHER INFO	
Container No.	Marks and Numbers Area

CONTACT INFO		
Type	Name	Address
CONSIGNEE	SEOHAE FISHERY USA, INC. 	7194,OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD21046 TEL) 410-381-6427
NOTIFY PARTY	SEOHAE FISHERY USA, INC. 	7194,OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD21046 TEL) 410-381-6427
SHIPPER	ONE TRADING CO. 	876-618, JEONGWANG-DONG SIHEUNG-SI, KYEONGGI-DO, KOREA

PRODUCT DETAILS	
Container No.	Description Area
INKU2254048	INSTANT NOODLES W/SOUP BASE @INVOICE NO. OTSY07007

TRANSIT DETAILS	
Property	Value
CARRIER	EGLV - EVERGREEN LINE
ADDRESS	NO 163 SEC 1 HSIN-NAN ROAD LUCHU HSIAN TAOYUAN HSIEN 338
TAIWAN	
CONTACT NO.:	8863312320
SHIP REGISTERED IN	PANAMA
VESSEL	EVER REACH
VOYAGE	0400E
US PORT	BALTIMORE, MARYLAND
FOREIGN PORT	COLON
COUNTRY OF ORIGIN	PANAMA
PLACE OF RECEIPT	PUSAN
BILL OF LADING	EGLV040710608917
ARRIVAL DATE	2008-02-03
QUANTITY	3550 CTN
CONTAINER COUNT	1
WEIGHT (LB / KG)	24,262 / 11,028
CBM	67 CM
HOUSE VS MASTER	
IN-BOND ENTRY TYPE	00 - CONSUMPTION CATEGORY

OTHER INFO	
Container No.	Marks and Numbers Area

CONTACT INFO		
Type	Name	Address
CONSIGNEE	SEOHAE FISHERY USA, INC. 	7194,OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD21046 TEL) 410-381-6427
NOTIFY PARTY	SEOHAE FISHERY USA, INC. 	7194,OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD21046 TEL) 410-381-6427
SHIPPER	ONE TRADING CO. 	876-618, JEONGWANG-DONG SIHEUNG-SI, KYEONGGI-DO, KOREA

PRODUCT DETAILS	
Container No.	Description Area
EMCU9216786	INSTANT NOODLES W/SOUP BASE @INVOICE NO. OTSY07006

TRANSIT DETAILS	
Property	Value
CARRIER	EGLV - EVERGREEN LINE
ADDRESS	NO 163 SEC 1 HSIN-NAN ROAD LUCHU HSIAO TAOYUAN HSIEN 338 TAIWAN CONTACT NO.: 8863312320
SHIP REGISTERED IN	PANAMA
VESSEL	EVER REACH
VOYAGE	0400E
US PORT	BALTIMORE, MARYLAND
FOREIGN PORT	COLON
COUNTRY OF ORIGIN	PANAMA
PLACE OF RECEIPT	PUSAN
BILL OF LADING	EGLV040710617851
ARRIVAL DATE	2008-02-03
QUANTITY	3650 CTN
CONTAINER COUNT	1
WEIGHT (LB / KG)	24,592 / 11,178
CBM	68 CM
HOUSE VS MASTER	
IN-BOND ENTRY TYPE	00 - CONSUMPTION CATEGORY

OTHER INFO	
Container No.	Marks and Numbers Area

CONTACT INFO		
Type	Name	Address
CONSIGNEE	SEOHAE FISHERY USA, INC. 	7194,OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD 21046 TEL)410-381-6427
NOTIFY PARTY	SEOHAE FISHERY USA, INC. 	7194,OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD 21046 TEL)410-381-6427
SHIPPER	ONE TRADING CO. 	876-618 JEONGWANG-DONG SIHEUNG-SI, KYEONGGI-DO, KOREA

PRODUCT DETAILS	
Container No.	Description Area
XINU8093021	INSTANT NOODLES W/SOUP BASE @INVOICE NO. OTSY08004

TRANSIT DETAILS	
Property	Value
CARRIER	EGLV - EVERGREEN LINE
ADDRESS	NO 163 SEC 1 HSIN-NAN ROAD LUCHU HSIA TAOYUAN HSIEN 338
	TAIWAN
	CONTACT NO.: 8863312320
SHIP REGISTERED IN	PANAMA
VESSEL	EVER REWARD
VOYAGE	0313E
US PORT	LOS ANGELES, CALIFORNIA
FOREIGN PORT	PUSAN
COUNTRY OF ORIGIN	SOUTH KOREA
PLACE OF RECEIPT	PUSAN
BILL OF LADING	EGLV040800028057
ARRIVAL DATE	2008-02-20
QUANTITY	3700 CTN
CONTAINER COUNT	1
WEIGHT (LB / KG)	23,439 / 10,654
CBM	66 CM
HOUSE VS MASTER	
IN-BOND ENTRY TYPE	00 - CONSUMPTION CATEGORY

OTHER INFO	
Container No.	Marks and Numbers Area

CONTACT INFO		
Type	Name	Address
CONSIGNEE	SEOHAE FISHERY USA, INC. 	7194,OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD 21046 TEL)410-381-6427
NOTIFY PARTY	SEOHAE FISHERY USA, INC. 	7194,OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD 21046 TEL)410-381-6427
SHIPPER	ONE TRADING CO. 	876-618 JEONGWANG-DONG SIHEUNG-SI, KYEONGGI-DO, KOREA

PRODUCT DETAILS	
Container No.	Description Area
GVCU5021889	INSTANT NOODLES W/SOUP BASE @INVOICE NO. OTSY08003

TRANSIT DETAILS	
Property	Value
CARRIER	EGLV - EVERGREEN LINE
ADDRESS	NO 163 SEC 1 HSIN-NAN ROAD LUCHU HSIA TAOYUAN HSIEN 338 TAIWAN CONTACT NO.: 8863312320
SHIP REGISTERED IN	PANAMA
VESSEL	EVER REWARD
VOYAGE	0313E
US PORT	LOS ANGELES, CALIFORNIA
FOREIGN PORT	PUSAN
COUNTRY OF ORIGIN	SOUTH KOREA
PLACE OF RECEIPT	PUSAN
BILL OF LADING	EGLV040800011006
ARRIVAL DATE	2008-02-20
QUANTITY	3800 CTN
CONTAINER COUNT	1
WEIGHT (LB / KG)	23,588 / 10,722
CBM	68 CM
HOUSE VS MASTER	
IN-BOND ENTRY TYPE	00 - CONSUMPTION CATEGORY

OTHER INFO	
Container No.	Marks and Numbers Area

CONTACT INFO		
Type	Name	Address
CONSIGNEE	SEOHAE FISHERY USA, INC. 	7194,OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD21046 TEL) 410-381-6427
NOTIFY PARTY	SEOHAE FISHERY USA, INC. 	7194,OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD21046 TEL) 410-381-6427
SHIPPER	ONE TRADING CO. 	876-618, JEONGWANG-DONG SIHEUNG-SI, KYEONGGI-DO, KOREA

PRODUCT DETAILS	
Container No.	Description Area
IMTU9037563	INSTANT NOODLES W/SOUP BASE @INVOICE NO. OTSY08002

TRANSIT DETAILS	
Property	Value
CARRIER	EGLV - EVERGREEN LINE
ADDRESS	NO 163 SEC 1 HSIN-NAN ROAD LUCHU HSIAN TAOYUAN HSIEN 338 TAIWAN
CONTACT NO.:	8863312320
SHIP REGISTERED IN	PANAMA
VESSEL	EVER REFINE
VOYAGE	0403E
US PORT	BALTIMORE, MARYLAND
FOREIGN PORT	COLON
COUNTRY OF ORIGIN	PANAMA
PLACE OF RECEIPT	PUSAN
BILL OF LADING	EGLV040800015621
ARRIVAL DATE	2008-02-28
QUANTITY	3700 CTN
CONTAINER COUNT	1
WEIGHT (LB / KG)	23,439 / 10,654
CBM	86 CM
HOUSE VS MASTER	
IN-BOND ENTRY TYPE	00 - CONSUMPTION CATEGORY

OTHER INFO	
Container No.	Marks and Numbers Area

CONTACT INFO		
Type	Name	Address
CONSIGNEE	SEOHAE FISHERY USA, INC. 	7194,OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD21046 TEL) 410-381-6427
NOTIFY PARTY	SEOHAE FISHERY USA, INC. 	7194,OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD21046 TEL) 410-381-6427
SHIPPER	ONE TRADING CO. 	876-618, JEONGWANG-DONG SIHEUNG-SI, KYEONGGI-DO, KOREA

PRODUCT DETAILS	
Container No.	Description Area
TGHU8148223	INSTANT NOODLES W/SOUP BASE @INVOICE NO. OTSY08001

TRANSIT DETAILS	
Property	Value
CARRIER	EGLV - EVERGREEN LINE
ADDRESS	NO 163 SEC 1 HSIN-NAN ROAD LUCHU HSIAN TAOYUAN HSIEN 338 TAIWAN
CONTACT NO.:	8863312320
SHIP REGISTERED IN	PANAMA
VESSEL	EVER REFINE
VOYAGE	0403E
US PORT	BALTIMORE, MARYLAND
FOREIGN PORT	COLON
COUNTRY OF ORIGIN	PANAMA
PLACE OF RECEIPT	PUSAN
BILL OF LADING	EGLV040800007131
ARRIVAL DATE	2008-02-28
QUANTITY	3900 CTN
CONTAINER COUNT	1
WEIGHT (LB / KG)	23,133 / 10,515
CBM	67 CM
HOUSE VS MASTER	
IN-BOND ENTRY TYPE	00 - CONSUMPTION CATEGORY

OTHER INFO	
Container No.	Marks and Numbers Area

CONTACT INFO		
Type	Name	Address
CONSIGNEE	SEOHAE FISHERY USA, INC. 	7194,OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD 21046 TEL)410-381-6427
NOTIFY PARTY	SEOHAE FISHERY USA, INC. 	7194,OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD 21046 TEL)410-381-6427
SHIPPER	ONE TRADING CO. 	876-618 JEONGWANG-DONG SIHEUNG-SI, KYEONGGI-DO, KOREA

PRODUCT DETAILS	
Container No.	Description Area
XINU8093021	INSTANT NOODLES W/SOUP BASE @INVOICE NO. OTSY08004

TRANSIT DETAILS	
Property	Value
CARRIER	EGLV - EVERGREEN LINE
ADDRESS	NO 163 SEC 1 HSIN-NAN ROAD LUCHU HSIAN TAOYUAN HSIEN 338
TAIWAN	
CONTACT NO.:	8863312320
SHIP REGISTERED IN	PANAMA
VESSEL	EVER RADIANT
VOYAGE	0405E
US PORT	BALTIMORE, MARYLAND
FOREIGN PORT	COLON
COUNTRY OF ORIGIN	PANAMA
PLACE OF RECEIPT	PUSAN
BILL OF LADING	EGLV040800028057
ARRIVAL DATE	2008-03-10
QUANTITY	3700 CTN
CONTAINER COUNT	1
WEIGHT (LB / KG)	23,439 / 10,654
CBM	66 CM
HOUSE VS MASTER	
IN-BOND ENTRY TYPE	00 - CONSUMPTION CATEGORY

OTHER INFO	
Container No.	Marks and Numbers Area

CONTACT INFO		
Type	Name	Address
CONSIGNEE	SEOHAE FISHERY USA, INC. 	7194,OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD 21046 TEL)410-381-6427
NOTIFY PARTY	SEOHAE FISHERY USA, INC. 	7194,OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD 21046 TEL)410-381-6427
SHIPPER	ONE TRADING CO. 	876-618 JEONGWANG-DONG SIHEUNG-SI, KYEONGGI-DO, KOREA

PRODUCT DETAILS	
Container No.	Description Area
GVCU5021889	INSTANT NOODLES W/SOUP BASE @INVOICE NO. OTSY08003

TRANSIT DETAILS	
Property	Value
CARRIER	EGLV - EVERGREEN LINE
ADDRESS	NO 163 SEC 1 HSIN-NAN ROAD LUCHU HSIAN TAOYUAN HSIEN 338
TAIWAN	
CONTACT NO.:	8863312320
SHIP REGISTERED IN	PANAMA
VESSEL	EVER RADIANT
VOYAGE	0405E
US PORT	BALTIMORE, MARYLAND
FOREIGN PORT	COLON
COUNTRY OF ORIGIN	PANAMA
PLACE OF RECEIPT	PUSAN
BILL OF LADING	EGLV040800011006
ARRIVAL DATE	2008-03-10
QUANTITY	3800 CTN
CONTAINER COUNT	1
WEIGHT (LB / KG)	23,588 / 10,722
CBM	68 CM
HOUSE VS MASTER	
IN-BOND ENTRY TYPE	00 - CONSUMPTION CATEGORY

OTHER INFO	
Container No.	Marks and Numbers Area

CONTACT INFO		
Type	Name	Address
CONSIGNEE	SEOHAE FISHERY USA, INC. 	7194 OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD21046 TEL) 410-381-6427
NOTIFY PARTY	SEOHAE FISHERY USA, INC. 	7194 OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD21046 TEL) 410-381-6427
SHIPPER	ONE TRADING CO. 	876-618, JEONGWANG-DONG SIHEUNG-SI, KYEONGGI-DO, KOREA

PRODUCT DETAILS	
Container No.	Description Area
IMTU9088386	INSTANT NOODLES INVOICE NO. OTSY08005

TRANSIT DETAILS	
Property	Value
CARRIER	EGLV - EVERGREEN LINE
	ADDRESS NO 163 SEC 1 HSIN-NAN ROAD LUCHU HSIAN TAOYUAN HSIEN 338 TAIWAN CONTACT NO.: 8863312320
SHIP REGISTERED IN	PANAMA
VESSEL	EVER REACH
VOYAGE	0317E
US PORT	LOS ANGELES, CALIFORNIA
FOREIGN PORT	PUSAN
COUNTRY OF ORIGIN	SOUTH KOREA
PLACE OF RECEIPT	PUSAN
BILL OF LADING	EGLV040800042122
ARRIVAL DATE	2008-03-21
QUANTITY	3800 CTN
CONTAINER COUNT	1
WEIGHT (LB / KG)	23,588 / 10,722
CBM	68 CM
HOUSE VS MASTER	
IN-BOND ENTRY TYPE	00 - CONSUMPTION CATEGORY

OTHER INFO	
Container No.	Marks and Numbers Area

CONTACT INFO		
Type	Name	Address
CONSIGNEE	SEOHAE FISHERY USA, INC. 	7194,OAKLAND MILLS ROAD(BAY1&2) COLLUMBIA, MD21046 TEL)410-381-6427
NOTIFY PARTY	SEOHAE FISHERY USA, INC. 	7194,OAKLAND MILLS ROAD(BAY1&2) COLLUMBIA, MD21046 TEL)410-381-6427
SHIPPER	ONE TRADING CO. 	876-618, JEONGWANG-DONG SIHEUNG-SI, KYEONGGI-DO, KOREA

PRODUCT DETAILS	
Container No.	Description Area
EMCU9374312	INSTANT NOODLES W/SOUP BASE INVOICE NO. OTSY08006

TRANSIT DETAILS	
Property	Value
CARRIER	EGLV - EVERGREEN LINE
	ADDRESS NO 163 SEC 1 HSIN-NAN ROAD LUCHU HSIAN TAOYUAN HSIEN 338 TAIWAN CONTACT NO.: 8863312320
SHIP REGISTERED IN	PANAMA
VESSEL	EVER DIADEM
VOYAGE	0319E
US PORT	LOS ANGELES, CALIFORNIA
FOREIGN PORT	PUSAN
COUNTRY OF ORIGIN	SOUTH KOREA
PLACE OF RECEIPT	PUSAN
BILL OF LADING	EGLV040800050249
ARRIVAL DATE	2008-03-31
QUANTITY	3500 CTN
CONTAINER COUNT	1
WEIGHT (LB / KG)	24,002 / 10,910
CBM	67 CM
HOUSE VS MASTER	
IN-BOND ENTRY TYPE	00 - CONSUMPTION CATEGORY

OTHER INFO
Container No. Marks and Numbers Area

CONTACT INFO		
Type	Name	Address
CONSIGNEE	SEOHAE FISHERY USA, INC. 	7194, OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD21046 TEL)410-381-6427
NOTIFY PARTY	SEOHAE FISHERY USA, INC. 	7194, OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD21046 TEL)410-381-6427
SHIPPER	ONE TRADING CO. 	876-618, JEONGWANG-DONG SIHEUNG-SI, KYEONGGI-DO, KOREA

PRODUCT DETAILS	
Container No.	Description Area
TCNU9100140	INSTANT NOODLES W/SOUP BASE INVOICE NO. OTSY08008

TRANSIT DETAILS	
Property	Value
CARRIER	EGLV - EVERGREEN LINE
ADDRESS	NO 163 SEC 1 HSIN-NAN ROAD LUCHU HSIAN TAOYUAN HSIEN 338 TAIWAN
CONTACT NO.:	8863312320
SHIP REGISTERED IN	PANAMA
VESSEL	EVER DIVINE
VOYAGE	0321E
US PORT	LOS ANGELES, CALIFORNIA
FOREIGN PORT	PUSAN
COUNTRY OF ORIGIN	SOUTH KOREA
PLACE OF RECEIPT	PUSAN
BILL OF LADING	EGLV040800072102
ARRIVAL DATE	2008-04-16
QUANTITY	2740 CTN
CONTAINER COUNT	1
WEIGHT (LB / KG)	25,494 / 11,588
CBM	67 CM
HOUSE VS MASTER	
IN-BOND ENTRY TYPE	00 - CONSUMPTION CATEGORY

OTHER INFO	
Container No.	Marks and Numbers Area

CONTACT INFO		
Type	Name	Address
CONSIGNEE	SEOHAE FISHERY USA, INC. 	7194, OAKLAND MILLS ROAD (BAY1&2) COLUMBIA, MD21046 TEL)410-381-6427
NOTIFY PARTY	SEOHAE FISHERY USA, INC. 	7194, OAKLAND MILLS ROAD (BAY1&2) COLUMBIA, MD21046 TEL)410-381-6427
SHIPPER	ONE TRADING CO. 	876-618, JEONGWANG-DONG SIHEUNG-SI, KYEONGGI-DO, KOREA

PRODUCT DETAILS	
Container No.	Description Area
UGMU9002792	INSTANT NOODLES W/SOUP BASE INVOICE NO. OTSY08007

TRANSIT DETAILS	
Property	Value
CARRIER	EGLV - EVERGREEN LINE
ADDRESS	NO 163 SEC 1 HSIN-NAN ROAD LUCHU HSIAN TAOYUAN HSIEN 338 TAIWAN
CONTACT NO.:	8863312320
SHIP REGISTERED IN	PANAMA
VESSEL	EVER DIVINE
VOYAGE	0321E
US PORT	LOS ANGELES, CALIFORNIA
FOREIGN PORT	PUSAN
COUNTRY OF ORIGIN	SOUTH KOREA
PLACE OF RECEIPT	PUSAN
BILL OF LADING	EGLV040800070029
ARRIVAL DATE	2008-04-16
QUANTITY	3500 CTN
CONTAINER COUNT	1
WEIGHT (LB / KG)	24,002 / 10,910
CBM	66 CM
HOUSE VS MASTER	
IN-BOND ENTRY TYPE	00 - CONSUMPTION CATEGORY

OTHER INFO	
Container No.	Marks and Numbers Area

CONTACT INFO		
Type	Name	Address
CONSIGNEE	SEOHAE FISHERY USA, INC. 	7194,OAKLAND MILLS ROAD(BAY1&2) COLLUMBIA, MD21046 TEL)410-381-6427
NOTIFY PARTY	SEOHAE FISHERY USA, INC. 	7194,OAKLAND MILLS ROAD(BAY1&2) COLLUMBIA, MD21046 TEL)410-381-6427
SHIPPER	ONE TRADING CO. 	876-618, JEONGWANG-DONG SIHEUNG-SI, KYEONGGI-DO, KOREA

PRODUCT DETAILS	
Container No.	Description Area
EMCU9374312	INSTANT NOODLES W/SOUP BASE INVOICE NO. OTSY08006

TRANSIT DETAILS	
Property	Value
CARRIER	EGLV - EVERGREEN LINE
ADDRESS	NO 163 SEC 1 HSIN-NAN ROAD LUCHU HSIAN TAOYUAN HSIEN 338 TAIWAN
CONTACT NO.:	8863312320
SHIP REGISTERED IN	PANAMA
VESSEL	EVER REFINE
VOYAGE	0411E
US PORT	BALTIMORE, MARYLAND
FOREIGN PORT	COLON
COUNTRY OF ORIGIN	PANAMA
PLACE OF RECEIPT	PUSAN
BILL OF LADING	EGLV040800050249
ARRIVAL DATE	2008-04-24
QUANTITY	3500 CTN
CONTAINER COUNT	1
WEIGHT (LB / KG)	24,002 / 10,910
CBM	67 CM
HOUSE VS MASTER	
IN-BOND ENTRY TYPE	00 - CONSUMPTION CATEGORY

OTHER INFO	
Container No.	Marks and Numbers Area

CONTACT INFO		
Type	Name	Address
CONSIGNEE	SEOHAE FISHERY USA, INC. 	7194, OAKLAND MILLS ROAD (BAY1&2) COLUMBIA, MD21046 TEL)410-381-6427
NOTIFY PARTY	SEOHAE FISHERY USA, INC. 	7194, OAKLAND MILLS ROAD (BAY1&2) COLUMBIA, MD21046 TEL)410-381-6427
SHIPPER	ONE TRADING CO. 	876-618, JEONGWANG-DONG SIHEUNG-SI, KYEONGGI-DO, KOREA

PRODUCT DETAILS	
Container No.	Description Area
UGMU9002792	INSTANT NOODLES W/SOUP BASE INVOICE NO. OTSY08007

TRANSIT DETAILS	
Property	Value
CARRIER	EGLV - EVERGREEN LINE
ADDRESS	NO 163 SEC 1 HSIN-NAN ROAD LUCHU HSIAN TAOYUAN HSIEN 338 TAIWAN
CONTACT NO.:	8863312320
SHIP REGISTERED IN	PANAMA
VESSEL	EVER RADIANT
VOYAGE	0413E
US PORT	BALTIMORE, MARYLAND
FOREIGN PORT	COLON
COUNTRY OF ORIGIN	PANAMA
PLACE OF RECEIPT	PUSAN
BILL OF LADING	EGLV040800070029
ARRIVAL DATE	2008-05-03
QUANTITY	3500 CTN
CONTAINER COUNT	1
WEIGHT (LB / KG)	24,002 / 10,910
CBM	66 CM
HOUSE VS MASTER	
IN-BOND ENTRY TYPE	00 - CONSUMPTION CATEGORY

OTHER INFO	
Container No.	Marks and Numbers Area

CONTACT INFO		
Type	Name	Address
CONSIGNEE	SEOHAE FISHERY USA, INC. 	7194, OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD21046 TEL)410-381-6427
NOTIFY PARTY	SEOHAE FISHERY USA, INC. 	7194, OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD21046 TEL)410-381-6427
SHIPPER	ONE TRADING CO. 	876-618, JEONGWANG-DONG SIHEUNG-SI, KYEONGGI-DO, KOREA

PRODUCT DETAILS	
Container No.	Description Area
TCNU9100140	INSTANT NOODLES W/SOUP BASE INVOICE NO. OTSY08008

TRANSIT DETAILS	
Property	Value
CARRIER	EGLV - EVERGREEN LINE
ADDRESS	NO 163 SEC 1 HSIN-NAN ROAD LUCHU HSIA TAOYUAN HSIEN 338
	TAIWAN
	CONTACT NO.: 8863312320
SHIP REGISTERED IN	PANAMA
VESSEL	EVER RADIANT
VOYAGE	0413E
US PORT	BALTIMORE, MARYLAND
FOREIGN PORT	COLON
COUNTRY OF ORIGIN	PANAMA
PLACE OF RECEIPT	PUSAN
BILL OF LADING	EGLV040800072102
ARRIVAL DATE	2008-05-03
QUANTITY	2740 CTN
CONTAINER COUNT	1
WEIGHT (LB / KG)	25,494 / 11,588
CBM	67 CM
HOUSE VS MASTER	
IN-BOND ENTRY TYPE	00 - CONSUMPTION CATEGORY

OTHER INFO	
Container No.	Marks and Numbers Area

CONTACT INFO		
Type	Name	Address
CONSIGNEE	SEOHAE FISHERY USA, INC. 	7194, OKLAND MILLS ROAD (BAY 1&2) COLUMBAL, MD21046 410-381-6427
NOTIFY PARTY	SEOHAE FISHERY USA, INC. 	7194, OKLAND MILLS ROAD (BAY 1&2) COLUMBAL, MD21046
SHIPPER	ONE TRADING CO. 	876-618, JEONGWAG-DONG, SIHEUNG-SI, KYEONGGI-DO, KOREA

PRODUCT DETAILS	
Container No.	Description Area
CBHU9955564	INSTANT NOODLES W/SOUP BASE

TRANSIT DETAILS	
Property	Value
CARRIER	BNXC - BINEX LINE CORPORATION
ADDRESS	200 N SEPULVEDA BLVD #1610 EL SEGUNDO CA, 90245
CONTACT NO.:	3104168600
SHIP REGISTERED IN	PANAMA
VESSEL	HANJIN ELIZABETH
VOYAGE	0109E
US PORT	NEW YORK, NEW YORK
FOREIGN PORT	PUSAN
COUNTRY OF ORIGIN	SOUTH KOREA
PLACE OF RECEIPT	BUSAN, KOREA
BILL OF LADING	BNXCBELONY804050
ARRIVAL DATE	2008-05-03
QUANTITY	2550 CTN
CONTAINER COUNT	1
WEIGHT (LB / KG)	26,136 / 11,880
CBM	69 CM
HOUSE VS MASTER	H
MASTER BILL OF LADING	COSU6008886741
IN-BOND ENTRY TYPE	00 - CONSUMPTION CATEGORY

OTHER INFO	
Container No.	Marks and Numbers Area

CONTACT INFO		
Type	Name	Address
CONSIGNEE	SEOHAE FISHERY USA, INC. 	7194, OKLAND MILLS ROAD (BAY 1&2) COLUMBAI, MD21046 410-381-6427
NOTIFY PARTY	SEOHAE FISHERY USA, INC. 	7194, OKLAND MILLS ROAD (BAY 1&2) COLUMBAI, MD21046
SHIPPER	ONE TRADING CO., 13DONG 	324HO 994-5, WONGOK-DONG, DANWON-GU, ANSAN-SI, KYUNGGI-DO, KOREA

PRODUCT DETAILS	
Container No.	Description Area
GVCU5256590	INSTANT NOODLES W/SOUP BASE

TRANSIT DETAILS	
Property	Value
CARRIER	BNXC - BINEX LINE CORPORATION
ADDRESS	200 N SEPULVEDA BLVD #1610 EL SEGUNDO CA, 90245
CONTACT NO.:	3104168600
SHIP REGISTERED IN	PANAMA
VESSEL	HANJIN ELIZABETH
VOYAGE	0109E
US PORT	NEW YORK, NEW YORK
FOREIGN PORT	PUSAN
COUNTRY OF ORIGIN	SOUTH KOREA
PLACE OF RECEIPT	BUSAN, KOREA
BILL OF LADING	BNXCBELONY804052
ARRIVAL DATE	2008-05-03
QUANTITY	3450 CTN
CONTAINER COUNT	1
WEIGHT (LB / KG)	23,800 / 10,818
CBM	68 CM
HOUSE VS MASTER	H
MASTER BILL OF LADING	COSU6008886740
IN-BOND ENTRY TYPE	00 - CONSUMPTION CATEGORY


OTHER INFO	
Container No.	Marks and Numbers Area

CONTACT INFO		
Type	Name	Address
CONSIGNEE	SEOHAE FISHERY USA, INC 	7194,OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD21046 TEL) 410-381-6427
NOTIFY PARTY	SEOHAE FISHERY USA, INC 	7194,OAKLAND MILLS ROAD(BAY1&2) COLUMBIA, MD21046 TEL) 410-381-6427
SHIPPER	ONE TRADING CO 	876-818, JEONGWANG-DONG SIHEUNG-SI, KYEONGGI-DO, KOREA

PRODUCT DETAILS	
Container No.	Description Area
TGHU8007781	INSTANT NOODLES

TRANSIT DETAILS	
Property	Value
CARRIER	EGLV - EVERGREEN LINE
ADDRESS	NO 163 SEC 1 HSIN-NAN ROAD LUCHU HSIAN TAOYUAN HSIEN 338 TAIWAN
CONTACT NO.:	8863312320
SHIP REGISTERED IN	PANAMA
VESSEL	EVER DE LUXE
VOYAGE	0418E
US PORT	BALTIMORE, MARYLAND
FOREIGN PORT	COLON
COUNTRY OF ORIGIN	PANAMA
PLACE OF RECEIPT	PUSAN
BILL OF LADING	EGLV040800093011
ARRIVAL DATE	2008-06-12
QUANTITY	3310 CTN
CONTAINER COUNT	1
WEIGHT (LB / KG)	25,615 / 11,643
CBM	68 CM
HOUSE VS MASTER	
IN-BOND ENTRY TYPE	00 - CONSUMPTION CATEGORY

OTHER INFO	
Container No.	Marks and Numbers Area
TGHU8007781	N/M N/M THE SAME

CONTACT INFO		
Type	Name	Address
CONSIGNEE	SEOHAE FISHERY USA, INC 	7194, OAKLAND MILLS ROAD (BAY1AND2)COLUMBIA, MD21046 TEL:410-381-6427
NOTIFY PARTY	SEOHAE FISHERY USA, INC 	7194, OAKLAND MILLS ROAD (BAY1AND2)COLUMBIA, MD21046 TEL:410-381-6427
SHIPPER	ONE TRADING CO 	876-618, JEONGWANG-DONG, SIHEUNG-SI, KYEONGGI-DO, KOREA

PRODUCT DETAILS	
Container No.	Description Area
FSCU9941676	INSTANT NOODLES W/SOUP BASE

TRANSIT DETAILS	
Property	Value
CARRIER	EGLV - EVERGREEN LINE
ADDRESS	NO 163 SEC 1 HSIN-NAN ROAD LUCHU HSIAN TAOYUAN HSIEN 338 TAIWAN
CONTACT NO.:	8863312320
SHIP REGISTERED IN	PANAMA
VESSEL	EVER RADIANT
VOYAGE	0421E
US PORT	BALTIMORE, MARYLAND
FOREIGN PORT	COLON
COUNTRY OF ORIGIN	PANAMA
PLACE OF RECEIPT	PUSAN
BILL OF LADING	EGLV040800111710
ARRIVAL DATE	2008-06-28
QUANTITY	1800 CTN
CONTAINER COUNT	1
WEIGHT (LB / KG)	24,394 / 11,088
CBM	66 CM
HOUSE VS MASTER	
IN-BOND ENTRY TYPE	00 - CONSUMPTION CATEGORY

OTHER INFO	
Container No.	Marks and Numbers Area
FSCU9941676	N/M N/M THE

SEOHAE FISHERY



President **Brandon Lee**

이 승 훈

leeshusa@gmail.com

Cell: 443.807.3520

Tel: 410.962.8218

Fax: 410.962.8217

2000B Washington Blvd., Baltimore, MD 21230



EXHIBIT 33

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Samyang Foods Co., Ltd.

Address 82-9, Hawolgok 1-dong, Songbuk-gu, Seoul, 136-131, Republic of Korea

Home Page : <http://www.samyangfood.co.kr>

E-mail : gongwook@hotmail.com

Telephone : +82-2-940-3340-4, 940-3292

Facsimile : +82-2-919-6180

Relax

To : S. C. CONTINENT CORPORATION

Date: NOV. 29, 2011.

Attn. : President Mun Kyung Chun, Managing Director Si Young Lee,

General Manager Woonbae Yeo

From : Overseas Sales Team

Total page(s) :2

including this covering

Subject: Proposal to normalize the transaction relations in 2012

*Reflecting fax dated
December 16 9:30*

We wish your company's continued prosperity.

Our company has continuously requested the reduction of price and payment terms since the Lehman Brothers situation in 2008, but your company has continued to postpone responding to our request using the status of special relations, stating the reasons of uncertainty of the U.S. economy and weakening international competitiveness. Our company has reached a situation where we have to stop export to U.S. if there is any further delay in reduction of price and payment terms. A company has a duty to generate profit and pay dividend to shareholders. However, it is impossible to generate profit in the transaction with your company due to deficit export. This is to notify the reduction and change in the terms of transaction with your company in 2012 as below under the principle of international transaction and in consideration of the equity with other exclusive agents in other countries for your reference.

- 1) Price: Our export price is the same all over the world based on cost and expected exchange rate. However, export to your company is made at the 15% discounted price (\$6.60 based on Samyang ramyun 20X) from the base export price of this company (Samyang Ramyun 20X base price \$7.60), which is provided at short of the cost of this company for your special relations. Therefore, this company will normalize all the prices for shipping from January 1, 2012 to the base price of this company in order to establish a more reasonable transaction order in the practice of transaction with your company.
- 2) Payment terms: Currently, export is made to all the overseas agents of this company at 100% T/T payment before shipping or L/C AT SIGHT. Currently your company has been changed from the existing T/T IN ADVANCE & L/C AT SIGHT condition to 90 days DA due to the recession of the U.S. economy and the MFN of special relations, but we would like to reduce to the previous payment terms as of January 1, 2012 and ask for your cooperation. Our company has received correction instructions many times due to transaction equity with other agents and through ex officio investigation by the Fair Transaction Committee and audits of Tax Offices, but for transaction safety of your

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company, in order to minimize the problems from sudden change in payment terms, we have gradually proceeded with minor reduction in 2010 and 2011 and we believe that we have entered the stage where we can minimize the risk even if we change the payment terms now.

- 3) Therefore, we will issue PRO-FORMA INVOICE normally regarding the container ordered after January 1, 2012 and will ship when the payment is confirmed. Therefore, please pay as scheduled for the unpaid amount as of December 31, 2011 to match the 3 months after shipping terms after accounting audit.

Thank you.



Sincerely,
Bonghoon Kim/Gong-wook Kim
Head of Sales Department, Samyang Food Co., Ltd. /Overseas Sales Team leader (Acting)

CC.

SAMYANG FOODS, *a Ramen Manufacturer with a proud history of 40 years' tradition based on Honesty and Credit*

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Approval	Person in charge	Head of Dept	President	Chairman
			Arbitrary Decision	Arbitrary Decision

SAMYANG0002851

Samyang Foods Co., Ltd.

Address : 82-9, Hawolgok 1-dong, Songbuk-gu, Seoul, 136-131, Republic of Korea

Home Page : <http://www.samyangfood.co.kr>

E-mail: gongwook@hotmail.com

Telephone : +82-2-940-3340~4, 940-3292

Facsimile : +82-2-919-6180

Refax

To : S.C CONTINENT CORPORATION

Date : NOV. 29, 2011.

Attn. : 전문경 사장님, 이시영 상무님, 여운배 부장님

Total page(s) : 2

From : 해외영업팀

including this covering

Subject : 2012 년 거래 관계 정상화를 위한 제안

2011.11.29 9:30
Fax 11/28

귀사의 일익 번창하심을 기원드립니다.

당사에서는 2008년 리먼브라더스 사태이후 가격 및 결제 조건의 환원을 지속적으로 요청드렸으나, 귀사에서는 미국 경제의 불확실성 및 국제 경쟁력 약화를 이유로 당사의 요청을 특수관계의 지위를 이용 계속해서 미루어 오셨으나, 당사에서는 더 이상 가격 및 결제 조건의 환원을 미룰시 미국으로의 수출을 전면 중단할 수밖에 없는 지경에 이르렀습니다. 기업은 이익을 창출하여 주주들에게 배당금을 지급하여야하는 의무가 있습니다. 그러나 귀사와의 거래는 적자 수출로 인한 기업 본연의 이익창출이 불가능한바 아래와 같이 2012 년 에 귀사와의 거래에 있어 다른 국가의 특정 AGENT 와의 형평성 및 원가 상승 및 국제 거래 원칙상 아래와 같이 조건을 환원 및 변경을 통지 드리오니 업무에 참조 하시기 바랍니다.

1) 가격 : 당사의 수출가격은 원가 및 예상 환율에 의거 전세계 동일한 가격으로 수출되어지고 있습니다. 그러나 귀사의 수출가격은 특수관계의 최혜국 대우로 당사의 기준 수출가(삼양라면 20 입 기준가 \$7.60)에 15% 할인된 (삼양라면 20 입기준 \$6.60) 가격에 수출되어지고 있는바, 당사의 원가에 못 미치는 가격으로 수출을 하고 있습니다. 이에 당사에서는 2012 년에 귀사의 거래관행에 보다 합리적인 거래 질서를 확립코자 2012 년 1 월 1 일부터 선적되는 모든 가격을 당사의 기준가로 정상화 시키고자 합니다.

2) 결제 조건 : 현재 당사의 모든 해외 AGENT 는 선적전 100% T/T 결제 이거나 L/C AT SIGHT 로 수출되어 지고 있습니다. 현재 귀사는 기존 T/T IN ADVANCE & L/C AT SIGHT 조건에서 미국 경기의 불황 및 특수관계의 최혜국대우로 90 DAYS DA 라는 거래로 변경이 되었으나, 기존의 결제조건으로 2012 년 1 월 1 일부터 환원코자 하오니 협조 당부 드립니다. 당사에서는 다른 AGENT 와의 거래 형평성 및 이로 인한 공정위의 직권조사 및 세무서 감사등을 통한 시정 지시를 여러 차례 받아왔으나, 귀사의 거래안전을 위하여

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갑작스러운 결제 조건 변경으로 문제 발생을 최소화 하고자 2010 년, 2011 년 미수축소를
정차 진행하여 이제는 결제 조건변경을 하여도 그 리스크를 최소화 할 수 있는 단계에
접어 들은 것으로 판단됩니다.

- 3) 이에 2012 년 1 월 1 일이후 발주되는 컨테이너에 대하여 정상적으로 PRO-FORMA
INVOICE 를 발행하고, 결제가 확인된 후에 선적토록 하겠습니다. 그러므로 2011 년
12 월 31 일자 미수에 대해서는 회계감사를 거쳐 선적일로부터 3 개월 조건에 맞게
일정대로 결제 부탁드립니다.

감사합니다.

김봉훈 / 김공욱 배상

삼양식품 영업본부장 / 해외영업팀장(대)

cc

SAMYANG FOODS, a Ramen Manufacturer with a proud history of 40 years' tradition based on Honesty and Credit.

NAME	NAME	NAME	NAME	NAME
9/2/15	9/2/15	9/2/15	9/2/15	9/2/15

CERTIFICATION OF TRANSLATION

and

DECLARATION

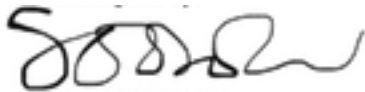
State of California)
) S. S.
Los Angeles County)

I, Soomi Ko, the undersigned, declare under penalty of perjury that I am a duly certified Korean Court Interpreter approved by the United States District Courts, certified by the State of California and the Los Angeles County Superior Courts, with competent knowledge of Korean and English, and that I have truthfully and correctly translated the pages of **8 documents with bates numbers as below** from Korean to English in accordance with Fed. R. Evid. 901 and that the said translation is, to the best of my knowledge and belief, a true and correct translation. I further declare under penalty of perjury that I am neither counsel for, related to, nor employed by any of the parties, and that I have no financial or other interest in the outcome of any action related to this translation. I declare under penalty of perjury that the foregoing is true and correct.

Detailed Description of Translations

1. SAMYANG0003340
2. SAMYANG0003344-45
3. SAMYANG0002848-51
4. SAMYANG0002776
5. SAMYANG0002717
6. SAMYANG0001066-68
7. SAMYANG0019241
8. SAMYANG0002986-87

Executed on November 1, 2017



Soomi Ko
California State Certified Court Interpreter
#300732
Direct: (213) 999-7848
soomi@komartin.com
www.komartin.com

Ko & Martin Certified Interpreters and Translators
Specializing in Korean and Chinese Languages

EXHIBIT 34

Confidential
#:2453

Samyang Foods Co., Ltd.

Address: 82-9, Hawolgok 1-dong, Songbuk-gu, Seoul, 136-131, Republic of Korea
Home Page: <http://www.samyangfood.co.kr>
E-mail: gongwook@hotmail.com
Telephone: +82-2-940-3340-4, 940-3292
Facsimile: +82-2-919-6180

To: S.C. CONTINENT CORPORATION

Date: MAY 04. 2012

Attn: President Mun-kyung Chun, Managing Director See-young Lee,
Sr. Manager Woon-bae Yeo

Total page(s): 1
including this covering

From: Overseas Sales Team

Subject: Regarding the price increase & existing accounts receivable and sale of the distribution rights.

We wish your company all the best.

Regarding your company's official letter via fax dated 3/19/2012, please see below for our reply.

- 1) Price: Regarding the request for delay of the price increase until 9/30/2012 (price has been increased twice for other clients in January 2010 and August 2011), upon review by our company, we would like to increase it as of June 1, 2012; please give us your feedback. This is because upon the investigation of our company by Fair Trade Commission, due to the special relationship between our company and your company, we are required to report to the Fair Trade Commission the plans and outcome of prompt actions to deal with the unfair trade activities concerning the special relation. We anticipate we would be subject to an order of actions if these measures are not taken, so we ask for your cooperation since it is the minimal measure taken in regards to this matter.
- 2) Regarding accounts receivable: Since we received your company's statement that you would send us \$50,000 per month as stated in your March 19th letter, we confirmed that the amount promised was deposited in March and April. However, as of today the outstanding accounts receivable is \$539,960.60, so if we proceed according to the letter, the accounts receivable will remain for another 10 months (up until February 2013). Such is part of the Fair Trade Commission's investigation as referenced in Section 1), so appropriate actions are required, such as putting collateral against the accounts receivable. Please review measures concerning the collateral of any kind toward the accounts receivable and notify us in writing.
- 3) Regarding the sale of the distribution rights: In regards to our company's purchase of your company's distribution rights, both sides have come close to agreeing \$1 million for the purchase price; however, please provide us your feedback on the increased portion of the amount in consideration of the U.S. taxation. In addition, we believe that sufficient explanation is needed in regards to the main entity of the distribution rights being transferred from SY USA to S.C. continent, and whether or not there are any rights and the relationship in regards to shares. This is an important part when preparing the TERMINATION AGREEMENT, so documents summarizing your company's position about this matter and objective supportive evidence are required. Thank you.

Sincerely,

Bong-hun Kim/ Gong-wook Kim

Samyang Foods, Director of Sales / Overseas Sales Team Leader (deputy)

cc

SAMYANG FOODS, a Ramen manufacturer with a proud history of 40 years' tradition based on Honesty and Credit.

Confidential

Approval	Person in charge	Branch manager	Director	
	//signature//	//signature//	//signature//	

Samyang Foods Co., Ltd.

Address : 82-9, Hawolgok 1-dong, Songbuk-gu, Seoul, 136-131, Republic of Korea

Home Page : <http://www.samyangfood.co.kr>

E-mail: gongwook@hotmail.com

Telephone : +82-2-940-3340~4, 940-3292

Facsimile : +82-2-919-6180

To : S.C CONTINENT CORPORATION

Date : MAY. 04, 2012.

Attn. : 전문경 사장님, 이시영 상무님, 여운배 부장님

Total page(s) : 1

From : 해외영업팀

including this covering

Subject : 가격인상 & 기존 미수 및 판권 매각 관련.

귀사의 일익 번창하심을 기원드립니다.

귀사의 2012.3.19 일자 fax 공문 관련 아래와 같이 회신 드리오니 참고 하시기 바랍니다.

- 1) 가격 : 2012년 9월 30일까지 유예 요청 하신 가격인상 관련(기타거래선의 가격이 2010년 1월, 2011년 8월 2차례인상), 당사에서 검토한 결과 2012년 6월 1일부터 인상하고자 하오니 의견 주시기 바랍니다. 이는 당사에 대한 공정거래위원회의 조사 결과 귀사와 당사는 특수 관계이므로 특수관계인에 대한 불공정 거래행위에 해당하여 신속한 조치에 대한 계획 및 결과를 공정거래위원회에 통보하여야 하고, 이에 대한 조치 미이행시 조치위계가 예상되는바, 이에 대한 최소한의 조치 이오니 협조 바랍니다.
- 2) 미수관련 : 귀사의 3월 19일자 공문에 매월 \$50,000 불씩 송금 하시겠다는 의견을 접수하고, 3월, 4월 약속하신대로 금액이 입금된 것을 확인하였습니다. 그러나 금일 현재 미수금이 \$539,960.60 이므로 공문대로라면 향후 10개월(2013년 02월까지)간 미수금이 유지되어야 하는바, 이는 1)항의 공정거래위원회의 조사 내용 중에 포함되어 있어 미수금에 대한 담보 등의 적절한 조치가 필요 합니다. 어떤 형태로든 미수금에 대한 담보 조치를 검토 후 서면 통보 바랍니다.
- 3) 판권 매각 관련: 귀사 판권의 당사 매각 금액에 대해 \$100 만불에 의견 접근을 보았으나, 미국쪽 세금 관련 금액이 상향 조정 된 부분에 대한 의견을 주시길 바랍니다. 또한 판권의 주체가 SY USA 에서 S.C continent 로 이관된 부분과 권리 유무관계와 자본관계에 대한 충분한 설명이 필요한 것으로 생각됩니다. 이는 TERMINATION AGREEMENT 작성시 중요한 부분으로 이에 대한 귀사의 입장정리 문서와 객관적인 입증 자료들이 필요합니다. 감사합니다.

김봉훈 / 김공욱 배상

삼양식품 영업본부장 / 해외영업팀장(대)

cc

SAMYANG FOODS, a Ramen Manufacturer with a proud history of 40 years' tradition based on Honesty and Credit.



CERTIFICATION OF TRANSLATION

and

DECLARATION

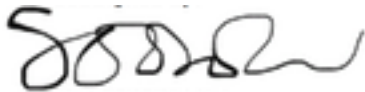
State of California)
) S. S.
Los Angeles County)

I, Soomi Ko, the undersigned, declare under penalty of perjury that I am a duly certified Korean Court Interpreter approved by the United States District Courts, certified by the State of California and the Los Angeles County Superior Courts, with competent knowledge of Korean and English, and that I have truthfully and correctly translated the pages of **8 documents with bates numbers as below** from Korean to English in accordance with Fed. R. Evid. 901 and that the said translation is, to the best of my knowledge and belief, a true and correct translation. I further declare under penalty of perjury that I am neither counsel for, related to, nor employed by any of the parties, and that I have no financial or other interest in the outcome of any action related to this translation. I declare under penalty of perjury that the foregoing is true and correct.

Detailed Description of Translations

1. SAMYANG0003340
2. SAMYANG0003344-45
3. SAMYANG0002848-51
4. SAMYANG0002776
5. SAMYANG0002717
6. SAMYANG0001066-68
7. SAMYANG0019241
8. SAMYANG0002986-87

Executed on November 1, 2017



Soomi Ko
California State Certified Court Interpreter
#300732
Direct: (213) 999-7848
soomi@komartin.com
www.komartin.com

Ko & Martin Certified Interpreters and Translators
Specializing in Korean and Chinese Languages

EXHIBIT 35

Confidential

MAY-09-2012 17:51 From:

S. C. Continent Corporation

10316 Norwalk Blvd., Santa Fe Springs, CA 90670
Tel: (562) 941-7879 Fax: (562) 946-9915

FAX NO:

DATE: 5/8/2012

TO: Managing Director Bonghoon Kim, Manager Gong-wook Kim

FROM: Managing Director Si Young Lee, General Manager Woonbae Yeo

SUBJECT: Business related

Matters related to your company's FAX dated May 4.

1. Price: As we requested via our FAX, our company's understanding was that price increase was suspended up to September 30, but we believe that unilateral notice for price increase starting on August 1 is unfair.

Because this company has lost a lot of markets because we were not able to provide products to the market and wholesaler for 3 months from the beginning of the year due to your delay in ramyun shipment, and price increase is not proper under this situation, and we believe it is proper to notice at least a few months in advance before the price increase. Please consider our company's difficult situation and suspend as requested in the official letter before the price increase.

As to the difficult circumstance that your company was investigated by the Fair Trade Commission, our common sense on the contrary is that the Fair Trade Commission is an agency to protect agencies and small companies from unilateral act of large companies. We would like to help with your difficulty, so if you have an official letter regarding the investigation results of the Fair Trade Commission, please send it to us. If there is no official letter, please let us know the department in charge at the Fair Trade Commission, and then our company will file a civil petition on whether it constitutes unfair trade act and dissolve the disadvantage to your company. Please send us the material as soon as possible.

Please reply whether our Legal Affairs Team may inquire the Fair Trade Commission about your company's FAX dated May 4 to verify it.

2. Regarding unpaid amount. As we notified you through our FAX dated March 19, we accommodated your payment terms by changing it from D/A 90 days to L/C at sight, even risking additional burden of enormous fund. As we have promised, we have wire transferred \$50,000.00 every month, and we plan to continue making payment for the unpaid amount every month, so we believe that the collateral that your company requested does not apply. This has already been approved by Chairman Jung-yoon Chun, and went through additional confirmation by the chairman on May 7, 2012, so please understand so that it won't be discussed again in the future.

SAMYANG0002776

S. C. Continent Corporation

10316 Norwalk Blvd., Santa Fe Springs, CA 90670
Tel: (562) 941-7879 Fax: (562) 946-9915

FAX NO :
DATE : 5/8/2012
TO : 김봉훈 상무, 김광숙 과장
FROM : 이시영 상무, 여운배 부장
SUBJECT : 형편

귀사 5월4일자 FAX 관련 사항입니다.

1. 가격: 당사 FAX 에서 요청드린 바와 같이, 당사는 9월30일 까지 가격인상을 유예하여 주시는 것으로 알고 있었으나,
8월1일부터 일방적으로 가격 인상 통보는 부당하다고 생각합니다.

예나하든, 당사는 연초부터 귀사의 라면 선적 지역으로,3개월 동안 마릴릿 WHOLESALER에 제품을 공급하여
주지 못해, 많은 시장을 잃어버린 상태에서,가격인상을 격결하지 못하며, 적어도 몇개월 전에 미리 통보한후,
가격을 인상하는 것이 타당하다고 생각되므로, 당사의 어려운 실정을 감안하시어 가격 인상 이전 공문에
요청드린바와 같이 유예하여 주시기 바랍니다.

귀사가 공정거래 위원회로부터 조사를 받은 어려운 사정에 대해, 당사가 아는 상식으로는, 공정거래 위원회는
반대로, 대기업에 하청이나 대리점들이 대기업에 일방적인 기업행위로 부터 대리점및 소기업들을 보호해주는 기관으로
알고 있으므로, 귀사의 어려움을 도와 드리려고 하오니 공정거래 위원회의 조사 결과에 대한 공문이 있으시면
당사로 보내 주시고, 만약 공문이 없으시면 공정거래 위원회의 담당 부서를 알려 주시면,당사가 불공정 거래
행위에 해당하는지 민원제기를 하여 귀사의 불이익을 해소할 계획이오니 조속 자료를 보내 주시기 바랍니다.
당사의 건우당에서도 확인하고자 공정거래 위원회에 귀사의 5월4일자 FAX 내용을
공정거래 위원회에 문의 하여도 되는지 회신 바랍니다.

2. 미수관련: 당사 FAX 5월18자 에서 통보 드린바와 같이, 결제 방식을 D/A 90일 에서 L/C at sight 결제조건 변경으로
당사의 막대한 자금의 추가 부담을 감수하면서 까지 귀사의 결제 조건을 수용한 것이며,
이미 약속 드린대로 매월 \$50,000.00 씩 송금하여 왔으며, 앞으로도 계속 매월 미수금을
정리할 계획이니, 귀사에서 요청하신 당보는 해당되지 않는 것으로 사료됩니다.
이는 이미 전경준 회장님의 승인이 있었으며, 2012년 5월 7일 회장님이 추가 확인을 거친 사항임으로
추후 재 거론 되는일이 없도록 양해 바랍니다.

CERTIFICATION OF TRANSLATION

and

DECLARATION

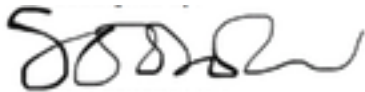
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